

File ref: FTAA-2502-1021

25 March 2025

Ministry for the Environment

C/- Fast-track team

By email: adminagencyFTAA@mfe.govt.nz



Tēnā koe

Consultation regarding a substantive application under the Fast-track Approvals Act 2024

Carter Group Limited has lodged a substantive application under the Fast-track Approvals Act 2024 (the Act). The Ryans Road Industrial Development application relates to a 55-hectare industrial subdivision at 104 Ryans Road, creating 126 freehold industrial lots, with infrastructure such as roads, three-waters utilities, and landscaping.

The substantive application includes applications for the following approvals under the Resource Management Act 1991 (RMA) that the Ministry for the Environment is the relevant administering agency for:

- a resource consent that would otherwise be applied for under the RMA (section 42(4)(a) of the Act)

The EPA must decide whether a substantive application complies with section 46 of the Act, being the completeness and scope assessment prior to referral of a substantive application to an Expert Panel. As part of making its decision, the EPA now consults with the Ministry for the Environment as the relevant administering agency for the RMA approval(s) sought. Note that the EPA also consults directly with the relevant consent authorities.

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Fast-track is administered by the Environmental Protection Authority
Private Bag 63002, Wellington 6140, New Zealand | NZBN: 9429041901977

Consultation

To inform the EPA's completeness assessment of the application, could you please let us know, in your view, whether the **attached via the portal** documentation regarding the RMA approvals as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

Please provide your response by 1 April 2025.

The EPA must decide on completeness of the substantive application by 14 April 2025. As such, if we do not hear back from you by 1 April 2025, we are unable to consider your response.

If you cannot respond by that deadline, please contact **s 9(2)(g)(ii)** as soon as possible upon receipt of this letter to discuss a timeframe for response that may be workable.

If you have any questions, please contact **s 9(2)(g)(ii)** Project Leader by email at info@fasttrack.govt.nz.

Nāku noa, nā

s 9(2)(g)(ii)

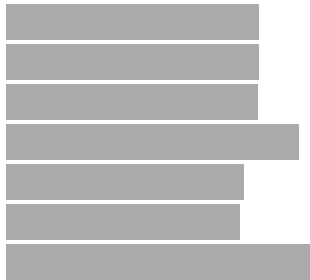
s 9(2)(g)(ii)

Senior Advisor, Fast-track Applications

File ref: FTAA-2502-1021

25 March 2025

Director General of Conservation
C/- Department of Conservation Fast-track team
By Email: Fast-track@doc.govt.nz



Tēnā koe

Consultation regarding a substantive list application under the Fast-track Approvals Act 2024

Carter Group Limited has lodged a substantive application under the Fast-track Approvals Act 2024 (the Act). The Ryans Road Industrial Development application relates to a 55-hectare industrial subdivision at 104 Ryans Road, creating 126 freehold industrial lots, with infrastructure such as roads, three-waters utilities, and landscaping.

The substantive application includes applications for the following approvals that the Department of Conservation (DOC) is the administering agency for under the following Acts:

- Wildlife approval (as defined un clause 1 of Schedule 7 of the Act) (section 42(4)(h) of the Act)

The EPA must decide whether a substantive application complies with section 46 of the Act, being the completeness and scope assessment prior to referral of a substantive application to an Expert Panel. As part of making its decision, the EPA must consult with DOC as the relevant administrating agency for the above listed approval(s) sought.

Consultation

To inform the EPA’s completeness assessment of the application, could you please let us know, in your view, whether the documentation provided by the EPA regarding the above approvals as provided by the applicant meet the requirements of sections 42 and 43 of the Act and is provided in

sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

Please provide your response by 1 April 2025.

The EPA must decide on completeness of the substantive application by 14 April 2025. As such, if we do not hear back from you by 1 April 2025, we are unable to consider your response.

If you cannot respond by that deadline, please contact s 9(2)(g)(ii) as soon as possible upon receipt of this letter to discuss a timeframe for response that may be workable.

If you have any questions, please contact s 9(2)(g)(ii) Project Leader by email at info@fasttrack.govt.nz.

Nāku noa, nā

s 9(2)(g)(ii)

s 9(2)(g)(ii)

Senior Advisor, Fast-track Applications

File ref: FTAA-2502-1021

25 March 2025

Stefanie Rixecker
Chief Executive
Environment Canterbury Regional Council
C/- [REDACTED]
By Email: fasttrack@ecan.govt.nz
[REDACTED]

Tēnā koe

Consultation regarding a substantive application under the Fast-track Approvals Act 2024

Carter Group Limited has lodged a substantive application under the Fast-track Approvals Act 2024 (the Act). The Ryans Road Industrial Development application relates to a 55-hectare industrial subdivision at 104 Ryans Road, creating 126 freehold industrial lots, with infrastructure such as roads, three-waters utilities, and landscaping.

The substantive application includes applications for the following approvals under the Resource Management Act 1991 (RMA) that Environment Canterbury Regional Council is the relevant consent authority for:

- a resource consent that would otherwise be applied for under the RMA (section 42(4)(a) of the Act)

The EPA must decide whether a substantive application complies with section 46 of the Act, being the completeness and scope assessment prior to referral of a substantive application to an Expert Panel. As part of making its decision, the EPA must consult with Environment Canterbury Regional Council as the relevant consent authority for the RMA approval(s) sought.

Consultation

To inform the EPA's completeness assessment of the application, could you please let us know, in your view, whether the **attached via portal** documentation regarding the RMA approvals as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

Specific questions relating to this application in accordance with section 30 of the Act

1. Confirm that the written notice prepared by Council remains accurate and final at the time of receiving this letter.

Please provide your response by 1 April 2025.

The EPA must decide on completeness of the substantive application by 14 April 2025. As such, if we do not hear back from you by 1 April 2025, we are unable to consider your response.

If you cannot respond by that deadline, please contact s 9(2)(g)(ii) as soon as possible upon receipt of this letter to discuss a timeframe for response that may be workable.

If you have any questions, please contact s 9(2)(g)(ii) Project Leader by email at info@fasttrack.govt.nz.

Nāku noa, nā

s 9(2)(g)(ii)

s 9(2)(g)(ii)

Senior Advisor, Fast-track Applications

File ref: FTAA-2502-1021

25 March 2025

Mary Richardson
Chief Executive
Christchurch City Council
C/- [REDACTED]
By Email: fasttrackresourceconsents@ccc.govt.nz
[REDACTED]

Tēnā koe

Consultation regarding a substantive application under the Fast-track Approvals Act 2024

Carter Group Limited has lodged a substantive application under the Fast-track Approvals Act 2024 (the Act). The Ryans Road Industrial Development application relates to a 55-hectare industrial subdivision at 104 Ryans Road, creating 126 freehold industrial lots, with infrastructure such as roads, three-waters utilities, and landscaping.

The substantive application includes applications for the following approvals under the Resource Management Act 1991 (RMA) that the Christchurch City Council is the relevant consent authority for:

- a resource consent that would otherwise be applied for under the RMA (section 42(4)(a) of the Act)

The EPA must decide whether a substantive application complies with section 46 of the Act, being the completeness and scope assessment prior to referral of a substantive application to an Expert Panel. As part of making its decision, the EPA must consult with Christchurch City Council as the relevant consent authority for the RMA approval(s) sought.

Consultation

To inform the EPA's completeness assessment of the application, could you please let us know, in your view, whether the **attached via the portal** documentation regarding the RMA approvals as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

Specific questions relating to this application in accordance with section 30 of the Act

1. Confirm that the written notice prepared by Council remains accurate and final at the time of receiving this letter.

Please provide your response by 1 April 2025.

The EPA must decide on completeness of the substantive application by 14 April 2025. As such, if we do not hear back from you by 1 April 2025, we are unable to consider your response.

If you cannot respond by that deadline, please contact s 9(2)(g)(ii) as soon as possible upon receipt of this letter to discuss a timeframe for response that may be workable.

If you have any questions, please contact s 9(2)(g)(ii) Project Leader by email at info@fasttrack.govt.nz.

Nāku noa, nā

s 9(2)(g)(ii)

s 9(2)(g)(ii)

Senior Advisor, Fast-track Applications

Memorandum on Completeness and Scope

File FTAA-2502-1021

Application Ryans Road Industrial Development

To Manager LOA/ Team Leader LOA

From s 9(2)(g)(ii) Senior Advisor

Date 14 April 2025

Subject Assessment whether the application complies with section 46(2) of the Fast-track Approvals Act 2024

Purpose

1. The purpose of this memo is to assist you in making your decision on whether the Ryans Road Industrial Development application, received by the Fast-track Team on 24 March 2025 lodged by Carter Group Limited complies with the requirements of section 46(2) of the Fast-track Approvals Act 2024 (**the Act**).

Decision-maker

2. You have delegated authority to make the decision under section 46 of the Act under the instrument of delegation dated 5 February 2025.

Conflict of interest

3. I confirm that I do not have any conflict of interest in this matter that would prevent me making this assessment.

The application

4. For projects listed in Schedule 2 of the Act and referred projects, authorised persons may lodge a substantive application for approvals available under the Act.
5. The Ryans Road Industrial Development is a listed project.
6. The EPA received the substantive application for Ryans Road Industrial Development on 24 March 2025 by Carter Group Limited. The EPA must, in consultation with the relevant administering agencies and relevant consent authorities, decide whether this substantive application complies with section 46 of the Act by 14 April 2025.

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7. As set out in more detail below, the EPA must decide whether the application is complete and either:
 - provide the application to the Panel Convener for consideration and decision by the expert consenting panel (if complete and within scope); or
 - return it to the person who lodged it (if incomplete and not within scope).

Project

8. The Ryans Road Industrial Development application relates to a 55-hectare industrial subdivision at 104 Ryans Road, Christchurch, creating 126 freehold industrial lots, with infrastructure such as roads, three-waters utilities, and landscaping. The application description is within scope with the listed project in Schedule 2 of the Act, to '*Subdivide and develop land for industrial use at 55.5 hectares*' at '104 Ryans Road, Harewood, Christchurch'.

Fast-track consenting application process

Legislative context

9. The EPA must decide whether the substantive application complies with section 46(2) of the Act. A substantive application complies with section 46(2) of the Act, if the application:
 - complies with sections 42, 43 and 44;
 - relates solely to a listed project or a referred project;
 - the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and
 - any fee, charge, or levy payable under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations) in respect of the application is paid.

Section 42 Requirements

10. Section 42 of the Act states that an authorised person may lodge a substantive application for one project or substantive applications for each stage of a project. Section 42(4) lists the approvals that may be sought under the Act.

Section 43 Requirements

11. Section 43 of the Act sets out the requirements for a substantive application. A substantive application must be lodged in the form and manner approved by the EPA and must include the information listed in this section. Assessment of section 43 requirements is included at Appendix 1.

Section 44 Requirements

12. Section 44 of the Act requires that the information provided by the applicant under section 43 must be specified in sufficient detail to satisfy the purpose for which it is required. Assessment of section 44 sufficiency is included at Appendix 1.

13. In assessing the sufficiency of information provided by the applicant, we rely on the information provided to us through consultation with each relevant administering agency and consent authority, as summarised in Appendix 2.

Ineligibility

14. The EPA needs to decide whether it considers that, on the face of the application, the project does not appear to involve an ineligible activity, as defined in section 5 of the Act. As the EPA has to consider this on the face of the application, the EPA is only able to consider information contained in the application materials.
15. The list of ineligible projects includes activities:
- on land returned under a Treaty settlement, on identified Māori Land, on Māori customary land, on land set apart as Māori reservation, or in a customary marine title or protected customary rights area without written permission from the rights holder;
 - on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993;
 - in a customary marine or protected customary rights area without written agreement from the rights holder/group;
 - within an aquaculture settlement area without the required authorisation;
 - activities that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA (which deal with occupation of space in the common marine and coastal area); or
 - that require permissions on national reserves held under the Reserves Act 1977 ; or
 - on land listed under clauses 1 to 11 or 14 of Schedule 4 of the Crown Minerals Act 1991 (and clauses 12 and 13 for mining activities).
16. For the reasons set out in Checklist J, on the face of the application, the project does not appear to involve an ineligible activity.

Fees and levies

17. The EPA has received all fees, charges and levies payable by the applicant under the Regulations for the substantive application as follows:
- Application fee in the sum of \$250,000 plus GST; and
 - Levy in the sum of \$140,000 plus GST.

Consultation

18. We have consulted with and considered consultation responses from the following relevant administering agencies and relevant consent authorities:
- with **Environment Canterbury Regional Council**, **Christchurch City Council**, and the **Ministry for the Environment (MfE)**, noting that we did not receive a response from MfE, for an approval described in section 42(4)(a) (resource consent); and

- with the **Department of Conservation** for an approval described in section 42(4)(h) (Wildlife Act wildlife approval).

19. A summary of the consultation is included at Appendix 2.

Assessment of compliance for each section of each application form

20. We have assessed the application materials against the relevant checklists in the prescribed application form. Each assessment is contained within the appropriate approval checklist. These are included in Appendix 1 for ease of reference.

21. My view is that the application does not comply with section 46 of the Act and should be returned to the applicant with written reasons for returning the application.

22. The aspects of the application that do not comply are as follows:

The following information is incomplete:

i. **Information to satisfy the requirements of section 13(4)(k)**

The application lacks a summary or evidence of consultation with the Ministry for the Environment (MfE) as the relevant administering agency of the Resource Management Act 1991 (RMA) under which approvals are sought.

Appendix 1: Assessment of section 44 sufficiency

This application seeks the following approval(s) under the Act:

- A resource consent, change to or cancellation of a resource consent: **checklist A**
- A resource consent, change to or cancellation of a resource consent: **checklist A1 – subdivision or reclamation**
- A wildlife approval: **checklist E.**
- Information requirements for all applications **checklist J.**

CHECKLIST A – Resource consent, change to or cancellation of a resource consent

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	Application Reference (Name of document, section and page)	EPA Office use only – EPA comments on completeness Note – for reference to the AEE, page numbers refer to the PDF reader rather than the documents.
5(1)(a)	A description of the proposed activity	AEE, the Proposal, pages 10-19;	Addressed , description of activities is provided, p 20, para 62-107 of the AEE.
5(1)(b)	<p>A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to—</p> <ul style="list-style-type: none"> (i) a statutory area (as defined in the relevant Treaty settlement Act); or (ii) ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or (iii) a protected customary rights area under the 	<p>AEE, the Proposal, pages 10-19;</p> <p>(b) AEE, Site and Surrounding Environment, pages 3-9.</p>	<p>Addressed, description of site and surrounding environment and contextual maps are provided, pp. 13-19, paras. 28-61 of the AEE.</p> <p>See also Appendix 3 Capture Scheme Plans.</p> <p>Christchurch City Council (CCC) also agree that the site is not in proximity to a statutory area, Ngā rohe moana o ngā hapū o Ngāti Porou, or a protected customary rights area.</p>

	Marine and Coastal Area (Takutai Moana) Act 2011		
5(1)(c)	<p>Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being:</p> <ul style="list-style-type: none"> • section 42; and • sections 43 and 44; and • relates solely to a listed project or a referred project; and • any fee, charge, or levy payable under regulations in respect of the application is paid. <p><i>Guidance note: Section 46 provides for the EPA to decide whether the substantive application is complete and within scope. The EPA will need to be satisfied that the application complies with these requirements. These matters are addressed throughout the substantive application form and relevant checklist.</i></p>	Covering letter to the Application, page 1 para [5]	<p>Addressed, Confirmation that the activity complies with section 46(2)(a), (b), and (d) is provided in the covering letter to the application</p> <p>The application relates solely to the listed project of ‘Subdivide and develop land for industrial use’ at the approximate geographical location of ‘55.5 hectares at 104 Ryans Road, Harewood, Christchurch’ as sited in Schedule 2 of the Act. It is noted that the site includes ‘balance land’ to the east of Grays Road, I believe that this is still considered within scope as the purpose is to provide for stormwater and water utility requirements, which fit the interpretation of ‘project’ under the Act.</p> <p>The application does not involve an ineligible activity.</p> <p>The application fee and levy has been paid, received by the EPA on 24 March 2025.</p>

5(1)(d) and 5(6)	<p>The full name and address of—</p> <ul style="list-style-type: none"> (i) each owner of the site and of land adjacent to the site; and (ii) each occupier of the site and of land adjacent to the site whom the applicant is unable to identify after reasonable inquiry; <p>If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the applicant must include a statement to that effect (clause 5(6)).</p>	Appendix 35 (Contact Details of Adjacent owners and occupiers)	<p>Addressed, full names and addresses of adjacent landowners and occupiers where known) have been provided in Appendix 35.</p> <p>The names of the owners of the site (104 Ryans Road - Lot 4 DP 22679, 20 Grays Road - Part Lot 1 DP 2837, and Part Lot 3 DP 22679) are found in the Record of Title certificates (Appendix 2).</p>
5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates	There are no other activities that are part of the proposal to which the consent application	Addressed , the application states there are no other activities that are part of the proposal.

		relates.	
5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates	There are no other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates	Addressed , the application states there are no other approvals to which the consent relates.
5(1)(g)	An assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991	AEE, Resource Management Act 1991 Considerations, pages 79-81	Addressed , Resource Management Act 1991 Considerations, Part 2 (page 89, paras. 388-394).
5(1)(h) (and also Clauses 5(2) and 5(3))	An assessment of the activity against any relevant provisions in any of the following documents: <ul style="list-style-type: none"> • a national environmental standard: • other regulations made under the Resource Management Act 1991: • a national policy statement: • a New Zealand coastal policy statement: • a regional policy statement or proposed regional policy statement: • a plan or proposed plan: • a planning document recognised by a relevant 	AEE, Relevant Provisions of Planning Instruments, pages 69-74	Addressed , see pp 79-123 of the AEE, also see appendix 32 Assessment provided against: <u>Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES-CS)</u> – The AEE E includes an assessment of the proposal in relation to the NES-CS at paragraphs 118-123. <u>National Policy Statement for Freshwater Management 2020</u> – relevant provisions are assessed in Appendix 32 . Based on their findings within their technical assessments, they have assessed the proposal as being consistent with

<p>iwi authority and lodged with a local authority.</p> <p>This assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being:</p> <ul style="list-style-type: none"> • any relevant objectives, policies or rules in the documents listed; and • any requirement, condition, or permission in any rules in any of those documents; and • any other requirements in any of those documents 		<p>the sole objective of the policy statement.</p> <p><u>National Policy Statement for Indigenous Biodiversity 2023</u> – relevant provisions are assessed in Appendix 32. Based on their findings within their technical assessments, they have assessed the proposal as being consistent with the sole objective of the policy statement.</p> <p><u>National Policy Statement for Highly Productive Land 2022</u> – The applicant has sought legal advice (Appendix 37) in regards to whether the site, which is zoned as Rural Urban Fringe (RUF), is a General Rural or Rural Production zone. The advice states that the site does not apply under the definition of highly productive land. Assessment has still been included in Appendix 32, should the panel considerations take alternative interpretation. See also p 80, paras. 340-46 of the AEE.</p> <p><u>National Policy Statement on Urban Development 2020</u> - relevant provisions are assessed in Appendix 32. The proposal has been assessed as being consistent with the policy statement.</p> <p><u>Canterbury Regional Policy Statement</u> – relevant objectives and policies include chapters 5, 6, 7, 11, 12, 15, 16, 17, and 19. These provisions are assessed in Appendix 32.</p> <p><u>Canterbury Land and Water Regional Plan</u> – relevant objectives include Objectives 3.1, 3.8, 3.16, 3.19, 3.23. These provisions are assessed in Appendix 32. Based on their findings within their technical assessments, they have assessed the proposal as being consistent with the sole</p>
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			<p>objective of the policy statement.</p> <p><u>Canterbury Air Regional Plan</u> – relevant objectives and policies are assessed in Appendix 32.</p> <p><u>The District Plan</u> - relevant objectives and policies are assessed in Appendix 32.</p> <p><u>Mahaanui Iwi Management Plan</u> – assessment of the relevant provisions are set out in Appendix 32.</p> <p><u>Canterbury Regional Land Transport Strategy</u> – assessment included in Appendix 32.</p>
5(1)(i)	<p>Information about any Treaty settlements that apply in the area covered by the consent application, including—</p> <ul style="list-style-type: none"> (i) identification of the relevant provisions in those Treaty settlements; and (ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area 	No Treaty Settlements apply.	Addressed , the application has stated that no treaty settlements apply. See p.9, para. 2.10 of the Covering letter attachment.
5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011;	There are no relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where	Not applicable - application indicated that this clause is not relevant to the proposal.

		an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011	
5(1)(k)	The conditions that the applicant proposes for the resource consent.	Appendix 18 (Proposed Conditions of Consent)	Addressed , proposed conditions Appendix 18. Part 1, pp 1-4: CCC Land Use Consent Conditions Part 2, pp 5-22: CCC Subdivision Consent Conditions Part 3, pp 22-26: CRC Earthworks/Land Use Conditions Part 4, pp 27-35: CRC Stormwater Discharge Conditions Part 6, pp 35-36: DOC conditions.
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,— (i) a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and (ii) if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware of about the existing resource consent referred to in the notice.	Appendix 33 (Canterbury Regional Council) Appendix 34 (Christchurch City Council)	Addressed , a written notice has been provided with the application from Environment Canterbury, dated 21 February 2025 (appendix 33). A written notice has been provided with the application from Christchurch City Council, dated 20 February 2025 (appendix 34). Both councils have also confirmed that the written notice remains accurate and final at the time of receiving the consultation package sent by the EPA on 31 March 2025.
5(4)(a)	An assessment of the activity’s effects on the environment that includes the information required by clause 6. <i>Guidance note: See rows below for requirements in clause 6.</i>	AEE More details in the rows below	Addressed , see comments regarding cl 6 below CCC raised that in relation to 6((a)

5(4)(b)	<p>An assessment of the activity's effects on the environment that covers the matters specified in clause 7.</p> <p><i>Guidance note: See rows below for requirements in clause 7.</i></p>	<p>AEE More details in the rows below</p>	<p>Addressed, see comments regarding cl 7 below</p>
6	<p>(1) The assessment of an activity's effects on the environment must include the following information:</p> <p>(a) an assessment of the actual or potential effects on the environment:</p> <p>(b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use:</p> <p>(c) if the activity includes the discharge of any contaminant, a description of—</p> <p>(i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and</p> <p>(ii) any possible alternative methods of discharge, including discharge into any other receiving environment:</p> <p>(d) a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity:</p> <p>(e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū</p>	<p>AEE (a) Assessment of Actual and Potential Effects on the Environment, pages 29-68 (b) N/A (c) N/A (d) AEE, Mitigation Measures, pages 77-78 (e) AEE, Consultation, pages 75-77 (f) AEE, Consultation, pages 75-77 (g) AEE, Mitigation Measures and Monitoring page 77; Appendix 18</p>	<p>Addressed, as complete for the purposes of s46, however, note the feedback received from CCC regarding mitigation measures (Councils' feedback may be read in verbatim in Appendix 2).</p> <p>(a) assessment provided, pp. 39-78 of the AEE</p> <p>(b) Not applicable, the activity does not include the use of hazardous installations.</p> <p>(c) Not applicable, no inclusion of discharge of any contaminant.</p> <p>(d) Mitigation measures are identified throughout the AEE (p.87), with mitigation proposed through design and required by conditions where relevant (Appendix 18). Note: CCC have provided feedback during consultation regarding the validity and practicability of the proposed mitigation conditions and highlights the fact that there will be opportunity to provide additional input, once the application is handed to the Panel Convener. These largely relate to:</p> <ul style="list-style-type: none"> - Consent Notice for land use conditions - Shortfall in water supply - Construction Noise and Vibration Management Plan (condition) - Contaminated soils, remedial action plan (condition)

<p>that have been consulted in relation to the proposal:</p> <p>(f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision:</p> <p>(g) if the scale and significance of the activity’s effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved:</p> <p>(h) an assessment of any effects of the activity on the exercise of a protected customary right.</p> <p><i>Guidance note: Clause 6(2) provides that a consent application need not include any additional information specified in a relevant policy statement or plan that would be required in an assessment of environmental effects under clause 6(2) or 7(2) of Schedule 4 of the Resource Management Act.</i></p>	<p>(Proposed consent conditions)</p> <p>(h) N/A</p>	<p>- transport effects</p> <p>(e) addressed, however, the AEE does not specifically list individuals who might be impacted. It does identify potentially affected persons concerning landscape and visual effects (see paragraph 167 of the AEE and Appendix 11), as well as noise from industrial activities (see paragraph 315 of the AEE and Appendix 04). Additionally, a consultation record is included in Appendix 24, with initial responses from Runanga documented in Appendices 29 and 30.</p> <p>(f) addressed under Consultation pp. 85-87 of the AEE.</p> <p>(g) addressed, p.87, Appendix 18</p> <p>(h) Not applicable, the activity is not relevant.</p>
<p>The assessment of an activity’s effects on the environment must cover the following matters:</p> <p>(a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:</p> <p>(b) any physical effect on the locality, including landscape and visual effects:</p> <p>(c) any effect on ecosystems, including effects on plants or</p>	<p>(a) AEE, Actual or Potential Effects (a), pages 29-36; see also Appendix 20 (Economics Assessment); Appendix 21 (Market Assessment) and Appendix 22 (Industrial Land Demand Assessment).</p>	<p>Addressed, as complete for the purposes of s46, however, note the feedback received from CCC.</p> <p>(a) Addressed see pp.41-46, paras. 139-161 of the AEE. Note: CCC feedback - ‘It is considered that the shortfall in water supply capacity for other plan enabled development represents an effect on the wider community that is not addressed in the AEE. As identified above, while an assessment has not been provided, this may be more efficiently dealt with through the panel process with the benefit of more substantial comments from Council infrastructure teams.’</p>

<p>animals and physical disturbance of habitats in the vicinity:</p> <p>(d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:</p> <p>(e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants:</p> <p>(f) any unreasonable emission of noise:</p> <p>(g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.</p>	<p>(b) AEE, Actual and Potential Effects (b), pages 36-56; see also Appendix 11 Landscape and Visual Impact Assessment; Appendix 23 Urban Design Assessment; Appendix 15 (lighting Assessment); Appendix 10 (Integrated Traffic Assessment); Appendix 9 (Avifauna Assessment); Appendix 4 (Acoustic Assessment); Appendix 25 (Green House Gas Emissions Assessment); Appendix 26 (Highly Productive Land and Soils Assessment); Appendix 27 (Water Quality Technical</p>	<p>(b) addressed, effects assessed:</p> <ul style="list-style-type: none"> - landscape and visual amenity (pp. 46-48, paras. 162-172 of the AEE and Appendix 11) - urban design (pp. 48-49, paras. 173-177 of the AEE and Appendix 23) - lighting (pp.49-52, paras. 178- 187 of the AEE and Appendix 15) - transport (pp. 52-54, paras. 188- 203 of the AEE and Appendix 10) - regionally significant infrastructure and reverse sensitivity (pp. 54-, paras. 204-235 of the AEE, Appendix 3, 4, 9) - climate change and green house gas (paras. 236-239 of the AEE, Appendix 25) - highly productive soils and rural production (paras. 240-249 of the AEE, Appendix 32) - three waters infrastructure (paras. 250-264, Appendix 12, 13) - water quality (paras. 265-274 of the AEE and Appendix 27, Appendix 13, Appendix 12). <p>Note: CCC feedback – <i>‘It is considered that the assessment of effects on the locality relating to transport included in both the AEE and Appendix 10, is incomplete noting the assumptions relating to the change of speed limit and lack of clarity in traffic modelling information. However, these matters may be more efficiently dealt with through the panel process alongside merits-based transport considerations.’</i></p> <p>(c) Addressed, the AEE outlines Ecology and Biodiversity Effects (Herpetology, Freshwater, and Avifauna) on pp. 66–</p>
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	<p>Assessment); Appendix 13 (Stormwater Management Technical Assessment); and Appendix 12 (Three Water Service Report).</p> <p>(c) AEE, Actual and Potential Effects pages 56-58; see also Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan); Appendix 8 (Wetlands and Waterways Assessment); and Appendix 9 (Avifauna Assessment).</p> <p>(d) AEE, Actual and Potential Effects (d), pages 59-61.</p> <p>(e) AEE, Actual and Potential Effects (e); see also Appendix 14</p>	<p>68. Paras. 274-279 of the AEE relate specifically to herpetology, to which the Lizard Management Plan (Appendix 7) is referenced. A field survey, as described on p. 20 of Appendix 7, states that although no presence of lizards were sighted, the habitat suggests that it could be likely. It also identified the Canterbury spotted skinks, jewelled geckos, southern grass skinks and Waitaha geckos being of importance due to their ‘at risk’ or ‘threatened’ status (these species have been identified through a desktop survey as described at 2.1 of Appendix 7). Actual and potential effects on lizards and methodology to avoid, remedy and mitigate effects are outlined on pp. 21-26.</p> <p>Note: CCC feedback <i>‘It is noted that the detailed baseline survey is likely to give more certainty as to the level of effect generated by the activity. However, the investigations provided with the application and conditions volunteered by the applicant, including the Lizard Management Plan, accord with the approach of the Christchurch City Council in processing applications for resource consent. Taking into account s44, the information provided is considered sufficient to satisfy the requirements of the clause.’</i></p> <p>(d) Addressed, the AEE evaluates the following impacts: - Cultural Effects (detailed in paras. 290-297, Appendix 28, and initial feedback from Te Ngāi Tūāhuriri Rūnanga and Te Taumutu Rūnanga found in Appendix 29 and 30).</p> <p>(e) Addressed, paras. 298-312 (appendix 12, 16) and (appendix 6)</p> <p>(f) Addressed, noise effects are assessed in paras. 322-325 of the AEE</p>
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		<p>(Infrastructure Report); Appendix 16 (Earthworks Management Plan); and Appendix 6 (Detailed Site Investigation).</p> <p>(f) AEE, Actual and Potential Effects (f), pages 64-66; see also Appendix 4 (Acoustic Assessment).</p> <p>(g) AEE, Actual and Potential Effects (g), pages 66-68; see also Appendix 5 (Geotechnical Assessment); and Appendix 31 (Flood Management Assessment)</p>	<p>(g) Addressed, geotechnical hazards are assessed (paras. 322-325 of the AEE and Appendix 5)</p>
5(5)(a)	<p>If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under section 87A(1) of the Resource Management Act 1991)</p>	<p>Appendix 32 (Assessment of Planning Provisions)</p>	<p>Addressed, The applicant has reviewed the proposal in relation to the Christchurch District and Regional Plan as detailed in Appendix 19. This section outlines the areas where consent is necessary and highlights the aspects of the proposal that meets Plan standards, with references to specialist reports</p>

5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set out in that document	N/A	Not applicable – activity does not occur in an area associated by a customary marine title group
5(5)(c)	If the activity is to occur in an area that is taiāpure-local fishery, a mātaimai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.	N/A	Not applicable – activity does not occur in an area that is relevant to this clause

CHECKLIST A1 – Subdivision or reclamation resource consent

Clause, Schedule 5	Information required for an application for a subdivision consent or a reclamation consent (in addition to the information required in Checklist A)	Application Reference (Name of document, section and page)	EPA Office use only – EPA comments on completeness Note – for reference to the AEE, page numbers refer to the PDF reader rather than the documents.
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If this application is for a subdivision consent, please adequately define the matters set out in clause 8(1) below.

8(1)(a)	The position of all new boundaries	Appendix (Capture Scheme Plans) page 4	Addressed , drawings of the proposed subdivision boundaries are provided in Appendix 03 Capture Scheme Plans , p. 4.
8(1)(b)	The areas of all new allotments, unless the subdivision involves a cross lease or company lease or unit plan	Appendix 3 (Capture Scheme Plans) page 4	Addressed , drawings of the proposed allotments are provided in Appendix 03 Capture Scheme Plans , p. 4.
8(1)(c)	The locations and areas of new reserves to be created, including any esplanade reserves and esplanade strips	Local reserves/green spaces are not proposed, but stormwater reserves (SMAS) and water utility reserves are proposed see AEE, paged 12-13, 54-55; Appendix 3 (Capture Scheme Plans) page 4	Addressed , see p. 23 and pp.64-65 of the AEE.

8(1)(d)	The locations and areas of existing esplanade reserves, esplanade strips, and access strips	There are no existing or proposed esplanade reserves, esplanade strips or access strips. See Appendix 3 (Capture Scheme Plans)	Not applicable
8(1)(e)	The locations and areas of any part of the bed of a river or lake to be vested in a territorial authority under section 237A of the Resource Management Act 1991	N/A	Not applicable
8(1)(f)	The locations and areas of any land within the coastal marine area that is to become part of the common marine and coastal area under section 237A of the Resource Management Act 1991	N/A	Not applicable
8(1)(g)	The locations and areas of land to be set aside as new roads	AEE, Subdivision (roading), page 12; Appendix 3 (Capture Scheme Plans), pages 17-33	Addressed , p. 22 of the AEE and Appendix 03 Capture Scheme Plans , pp. 17-33.

If this application is for a reclamation consent, please include the information to show the area to be reclaimed set out in clause 8(2) below.

8(2)(a)	The location of the area to be reclaimed		N/A
8(2)(b)	If practicable, the position of all new boundaries		N/A
8(2)(c)	Any part of the reclaimed area to be set aside as an esplanade reserve or esplanade strip		M/A

CHECKLIST E – Wildlife approval

Clause, Schedule 7	Information required for an approval described in section 42(4)(h) (Wildlife Act approval), clause 2 of Schedule 7	Application Reference (Name of document, section and page)	EPA Office use only – EPA comments on completeness Note – for reference to the AEE, page numbers refer to the PDF reader rather than the documents.
2(1)(a)	Specify the purpose of the proposed activity	Appendix 7 (Lizard Habitat Assessment and	Addressed , provided within the AEE (p. 11, para. 25) and Appendix 7 Introduction (p. 18) and p. 22)
2(1)(b)	Identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land) <i>Guidance note: Under clause 2(2) if the substantive application is to be lodged by more than 1 authorised person, the reference to the applicant in subclause (1)(b) is to the authorised person who is identified in the application as the proposed holder of the wildlife approval.</i>	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 2.	Addressed , see Project Responsibilities in Appendix 7, p. 19 and Methodology (include Vegetation management, surveys, salvage and relocation, relocations, adaptive management) on p.22 . The site is not on public conservation land.
2(1)(c)	An assessment of the activity and its impacts against the purpose of the Wildlife Act	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 3.	Addressed , throughout Appendix 7 , see p.3 and p. 18 for the Introduction to the Lizard Management Plan.
2(1)(d)	List protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 3.	Addressed , a desktop survey has been conducted to determine if any native lizards had been observed in the vicinity of the development area. Table 1 on p.2 of Appendix 7 lists 9 herpetofauna observed in proximity of the development site. The information provided has been informed by the DOC herpetofauna

			<p>database and the opensource species identification system (iNaturalist) as well as an ecologist site visit and survey.</p> <p>Note: DOC have raised “A desktop study has been provided but it does not reflect an accurate list of species likely to be present based on habitat (nor is it informed by detailed surveys, which DOC advised should be undertaken to inform an LMP).”</p>
2(1)(e)	An outline of impacts on threatened, data deficient, and at- risk wildlife species (as defined in the New Zealand Threat Classification System)	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 3.	<p>Addressed, as referenced, the applicant states that impacts could include habitat removal and mortality of lizard specimens as caused by site construction works. Although the impacts are broad, the clause requires an outline of the impacts. A high-level description is suitable since site assessments have identified lizard habitats but have not confirmed the presence of lizards.</p> <p>The threat status of the lizards is listed within section 4.2 of Appendix 7 (pp.20-21).</p> <p>Please note: DOC have provided feedback regarding the impacts and effects of the activity are unable to be practically assessed if they cannot be informed by the scale and presence of the protected species impacted by the approval. This</p>
2(1)(f)	A statement of how the methods proposed to be used to conduct the actions involving protected wildlife will ensure that best practice standards are met	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 3.	<p>Addressed,</p> <p>The correct clause reference is:</p> <p style="padding-left: 40px;"><i>state how the methods proposed to be used to conduct the actions specified under paragraph (b) will ensure that best practice standards are met:</i></p> <p>As stated above and on page 3 of Appendix 7, the applicant identifies the actions (clause b) as below:</p> <ul style="list-style-type: none"> - Vegetation clearance - Building and debris clearance - Site earthworks - Other operations

			<p>Methods for vegetation management, trapping pre-development, salvage and relocation, and accidental discovery protocol are discussed from page 22-26 of Appendix 7.</p> <p>The applicant has assessed their actions against the purpose of the Wildlife Act, as required by cl 7 (1)(c) of Sched 7, that the site area has potentially identified lizard habitat and disturbance of the site will in turn disturb the lizards.</p> <p>The applicant has asserted that the LMP provided at appendix C will ensure that best practice standards are met via adaptive management and protocols, see s6.5 of Appendix 7 p.26.</p> <p>Note: DOC have provided feedback to say: <i>'Best practice methods and the determination of relocation locations are a significant consideration for successful relocation activities (and when considering effects and impacts) particularly in relation to Lizards. The application did not specify where the relocation site would be.'</i></p>
2(1)(g)	A description of the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 3.	<p>Addressed, descriptions have been provided for 'pre-clearance salvage and relocation' which include methods to catch, hold, and relocate see p.23 Appendix 7. Accidental discovery procedures are discussed on p. 19.</p> <p>Note, DOC have provided the following feedback: <i>Tools such as pitfall traps, ACO, Gee minnow are cited and proposed to be used in the way intended, but duration and intensity or location is not adequately defined therefore DOC is unable to assess the effectiveness of the proposed methods.</i></p>
2(1)(h)	A statement of the location or locations in which the activity will be carried out, including a map (and GPS co- ordinates if available)	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 3.	<p>Addressed, description of site and surrounding environment and contextual maps are provided, pp. 13-19, paras. 28-61.</p> <p>See also Appendix 3 Capture Scheme Plans.</p>

			Note , the applicant has included a statement of the locations at which the project will be carried out as a whole. This is deemed as sufficient in terms of the purposes of section 46, however, DOC has provided feedback that they expect to see specific relocation sites in the case that lizards are found.
2(1)(i)	A statement of whether authorisation is sought to temporarily hold or relocate wildlife	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 3.	Addressed. A statement has been provided as referenced.
2(1)(j)	A list of all actual and potential wildlife effects (adverse or positive) of the proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 4.	Addressed , potential impacts have been identified as referenced by the applicant and include habitat removal and mortality of lizards. The AEE outlines Ecology and Biodiversity Effects (Herpetology, Freshwater, and Avifauna) on pp. 66–68 and in more detail on Lizards within Appendix 7 , pp. 21-22. Please note feedback from DOC: ‘DOC would anticipate that effects would be informed by surveys detailing species present on the site. As detailed surveys have not been provided as part of the application it is unlikely all effects are identified.’
2(1)(k)	Where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife)	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 4.	Addressed , Methods to minimise effects on lizards are stated within Appendix 7 , pp. 21-26. The applicant has stated the steps to be taken prior to the project beginning, which includes a survey that will confirm species present. Noting , DOC have highlighted insufficiencies and commented- ‘It is acknowledged that the relocation set out in this report seeks to minimise effects on lizards. More detailed surveys have not been undertaken prior to the lodgement of the application to inform a sufficient assessment of actual and potential

			<i>adverse effects and subsequently the methods provided do not relate to any detailed effects. Other than salvage there are no additional avoid/minimisation or compensation activities proposed.'</i>
2(1)(l)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 4.	Addressed , a statement is provided within Appendix 7, p.4
2(1)(m)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has any current criminal charges under the Wildlife Act pending before a court	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 4.	Addressed , a statement is provided within Appendix 7, p.4
2(1)(n)	Provision of proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 4-5.	Addressed , - consultation summary with DOC is provided (Appendix 7, p.37) - Te Taumutu Rūnanga via Mahaanui Kurataiao Ltd includes ecological recommendations specific to impacts (Appendix 30, p.8) - Te Ngāi Tūāhuriri Rūnanga via Mahaanui Kurataiao Ltd includes ecological recommendations specific to impacts (Appendix 29, p.8).
2(1)(o)	Provision of any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 5.	Addressed , within Appendix 7 .

CHECKLIST J – Listed project information requirements

Section, Fast-track Approvals Act	Information required for a substantive application under section 43(2) and section 13(4)	Application Reference (Name of document, section and page)	EPA Office use only – EPA comments on completeness Note – for reference to the AEE, page numbers refer to the PDF reader rather than the documents.
13(4)(a)	a description of the project and the activities it involves	AEE, the Proposal, pages 10-19	Addressed , description of activities is provided, pp. 20-29, paras. 62-107 of the AEE.
13(4)(c)	information to demonstrate that the project does not involve any ineligible activities (other than activities that may be the subject of a determination under section 23 or 24)	AEE, introduction, page 1; see also Covering letter to the Application, Attachment 2, paragraph 2.2	Addressed , as referenced on p. 11, para. 26, of the AEE and within the Covering letter.
13(4)(d)	a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application	AEE, Site and Surrounding Environment, pages 3-9.	Addressed , description of site and surrounding environment and contextual maps are provided, pp. 13-19, paras. 28-61 of the AEE. See also Appendix 3 Capture Scheme Plans.
13(4)(e)	the anticipated commencement and completion dates for construction activities (where relevant)	Appendix 1 (Application/ Authorised Persons' Statement), pg 2, para [13]	Addressed , para. 13 of Appendix 1 states that Carter Group is prepared to commence development as soon as possible after obtaining relevant approvals.
13(4)(f)(i)	a statement of whether the project is planned to proceed in stages and, if so an outline of the nature and timing of the stages	AEE, Subdivision (Allotments and Staging) pages 11- 12; see also Appendix 1 (Applicants/ Authorised	Addressed , paras. 13-16 of Appendix 1 states that it is proposed to develop the project in two stages within 12 months of each other, however the stages may or occur concurrently.

		Persons' Statement)	
13(4)(h)	a description of the anticipated and known adverse effects of the project on the environment	AEE, Assessment of Actual and Potential Effects on the Environment, pages 29-68	Addressed , a description has been provided.
13(4)(i)	a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991	Covering letter to the Application, Attachment 2, paragraph [2.7].	Addressed , statement included.
13(4)(j)	a list of the persons and groups the applicant considers are likely to be affected by the project, including— <ul style="list-style-type: none"> (i) relevant local authorities: (ii) iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements: (iii) other relevant iwi authorities: (iv) relevant Treaty settlement entities: (v) relevant protected customary rights groups and customary marine title groups: (vi) ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou: 	AEE, Consultation, pages 75-77.	Addressed , pp. 85-87 of the AEE.

	<p>(vii) relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011:</p> <p>(viii) persons with a registered interest in land that may need to be acquired under the Public Works Act 1981:</p>		
13(4)(k)	<p>a summary of—</p> <p>(i) the consultation undertaken for the purposes of section 29 and any other consultation undertaken on the project with the persons and groups referred to in paragraph (j); and</p> <p>(ii) how the consultation has informed the project:</p>	<p>AEE, Consultation, pages 75-77.</p>	<p>Not complete.</p> <p>Within the Covering Letter document (p.9, para 2.9), it states that the application includes a summary of the consultation undertaken for the purposes of s 29 and how the consultation has informed the Project (s 13(4)(k)).</p> <p>No summary, or proof of attempt, of consultation with the Ministry for the Environment has been included within the application.</p> <p>The consultation requirements (outlined in section 29(1)(a) require pre-lodgment consultation with relevant administering agencies (s 11(1)(e)). The Act interprets relevant administering agencies as:</p> <p><i>(a) in relation to a referral application, means an administering agency for a specified Act that relates to a proposed approval for the project:</i></p> <p><i>(b) in relation to a substantive application, means an administering agency for a specified Act that relates to an approval being sought in the substantive application</i></p> <p>The Ministry for the Environment is the administering agency for the Resource Management Act 1991 (RMA). The application includes approval under the RMA, therefore a summary of consultation is required under this section.</p>

13(4)(l)	a list of any Treaty settlements that apply to the project area, and a summary of the relevant principles and provisions in those settlements	No treaty settlements apply to the project area.	Addressed , the application has stated that no treaty settlements apply. See Covering letter attachment (p.9, para. 2.10).
13(4)(m)	a description of any processes already undertaken under the Public Works Act 1981 in relation to the project	No processes have been undertaken under the Public Works Act 1981.	Addressed , the application has stated that no processes have been undertaken under the Public Works Act 1981 in relation to the Project. See Covering letter attachment (p.10. para 2.11).
13(4)(n)	a statement of any relevant principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019	The Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 is not relevant to the application.	Not applicable to this application. See Covering letter attachment.
13(4)(o)	information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area	There are no parcels of Māori land, marae, and identified wāhi tapu within the project area.	Not applicable to this application
13(4)(p)	a statement of whether the applicant is seeking a determination under section 23 and, if so, an assessment of the effects of the activity on the relevant land and on the rights and interests of Māori in that land	The applicant is not seeking a determination under s 23; see covering letter to the Application, Attachment 2, paragraph [2.14].	Not applicable to this application
13(4)(q)	a statement of whether the applicant is seeking a determination under section 24(2) and, if so, a description of— (i) the scale and adverse effects of the existing electricity infrastructure; and (ii) how, if at all, that scale or those adverse	The applicant is not seeking a determination under s24(2); Covering letter to the Application, Attachment 2, paragraph [2.15].	Not applicable to this application

	effects are anticipated or known to change as a result of the maintenance, upgrading, or continued operation of the infrastructure		
13(4)(r)	<p>a statement of whether the applicant is seeking a determination under section 24(4) and, if so,—</p> <p>(i) a description of every alternative site considered by the applicant (or, if the referral application is lodged by more than 1 person, any of those persons) for the construction and operation of the new electricity lines (the activity); and</p> <p>(ii) for each alternative site considered,—</p> <p>(A) a statement of the anticipated and known financial cost of undertaking the activity; and</p> <p>(B) a description of the anticipated and known adverse effects of undertaking the activity; and</p> <p>(C) a description of the anticipated and known financial cost and practicality of available measures to avoid, remedy, mitigate, offset, or compensate for the anticipated and known adverse effects of the activity; and</p> <p>(D) a description of any issues (including financial cost) that would make it impractical to undertake the activity on the site; and</p>	The applicant is not seeking a determination under s 24(4) Covering letter to the Application, Attachment 2, paragraph [2.16].	Not applicable to this application

	(E) an assessment of whether it would be reasonable and practical to undertake the activity on the site, taking into account the matters referred to in subparagraphs (A) to (D) and any other relevant matters		
13(4)(s)	a description of the applicant's legal interest (if any), or if the application is lodged by more than 1 person, the legal interest of any of those persons) (if any), in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work	Appendix 1 (Applicant/Authorised Persons' Statement), page 1, paragraphs [6]-[7].	Addressed , in Appendix 1, p.1, paras. 6-7. The applicant group have signed a contract to purchase the land with the current registered landowner's conditional of obtaining the necessary approvals. Records of Titles are provided in Appendix 2 .
13(4)(t)	an outline of the types of consents, certificates, designations, concessions, and other legal authorisations (other than contractual authorisations or the proposed approvals) that the applicant considers are needed to authorise the project, including any that the applicant considers may be needed by someone other than the applicant	Covering letter to the Application, Attachment 2, paragraph [2.18].	Addressed , see Covering Letter to the Application, p.10, para. 2.18
13(4)(u)	whether any activities that are involved in the project, or are substantially the same as those involved in the project, have been the subject of an application or a decision under a specified Act and,— (i) if an application has been made, details of the application: (ii) if a decision has been made, the outcome of the decision and the reasons for it:	Covering letter to the Application, Attachment 2, paragraph [2.19].	Addressed , see Covering Letter to the Application, p.10, para. 2.19
13(4)(v)	a description of whether and how the project would be affected by climate change and natural hazards	AEE, Actual or Potential Effects, pages 50-51; see also Appendix 25	Addressed , as referenced (noting the page numbers of the AEE are pp. 60-61, paras. 236-239.

		(Green House Gas Emissions Assessment), page 14, paragraph 57; Appendix 5 (Geotechnical Assessment), section 5, page 9; Appendix 30 (Flood Hazard Assessment), section 4, pages 6-7.	
13(4)(w)	if the application is lodged by more than 1 person, a statement of the proposed approval to be held by each of those persons	N/A	Addressed, the application is not lodged by more than one authorised person as stated within the Covering Letter (p.10, para. 2.21).
13(4)(x)	a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant (or if the application is lodged by more than 1 person, any of those persons) under a specified Act	Covering letter to the Application, Attachment 2, paragraph [2.22]. There have been no compliance or enforcement actions taken against the applicant.	Addressed, as referenced.
13(4)(y)	Please provide the information specified below for the relevant approval(s) sought. This is the information specified in the relevant schedule.		
13(4)(y)(i), clause 2 of Schedule 5	Resource consent or designation (a) an assessment of the project against— (i) any relevant national policy statement; and	AEE, Relevant Provisions of Planning Instruments, pages 69-72.	Addressed, as referenced (noting pdf reader pages are: pp.79-82)

	<p>(ii) any relevant national environmental standards; and</p> <p>(iii) if relevant, the New Zealand Coastal Policy Statement; and</p>		
	<p>(iv) in relation to any proposed approval that is a resource consent, whether, to the best of the applicant's knowledge, there are any existing resource consents of the kind referred to in section 30(3)(a).</p> <p><i>Guidance note: If the application is to be lodged by more than 1 person, the reference to the applicant in subclause (1)(b) is to the person who will be identified in the application as the proposed holder of the resource consent.</i></p>	Christchurch City Council and Canterbury Regional Council have both confirmed that there are no existing consents of the kind referred to in s 30(3); see Appendix 33 and Appendix 34.	Addressed,
13(4)(y)(ii), clause 3 of Schedule 5	<p>Change or cancellation of resource consent condition</p> <p>The information to be provided under section 13(4)(y)(ii) is information about whether and how the change or cancellation of the condition is material to the implementation or delivery of the project.</p>		Not applicable – the application has no relevance to this clause.
13(4)(y)(iii), clause 4 of Schedule 5	<p>Certificate of compliance</p> <p>The information required to be provided under section 13(4)(y)(iii) is information that shows the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent. Include information that shows that the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location</p>		Not applicable – the application has no relevance to this clause.

	without a resource consent.		
13(4)(y)(iv), clause 2 of Schedule 6	<p>Concession</p> <p>(1) The information in subclause (2) is required to be provided under section 13(4)(y)(iv) if a proposed concession includes a lease and—</p> <p>(a) the lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and</p> <p>(b) the granting of the lease would trigger a right of first refusal or a right of offer or return.</p> <p>(i) Confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return to waive that right for the purposes of the proposed lease.</p> <p><i>Guidance note: If the application is to be lodged by more than 1 person, the reference to the applicant in subclause (2) is to the person who is to be identified in the application as the proposed holder of the concession (clause 2(3) of Schedule 6).</i></p>		Not applicable – the application has no relevance to this clause.
13(4)(y)(v), clause 23 of Schedule 6	<p>Land exchange</p> <p>(ii) The information required to be provided under section 13(4)(y)(b) is (a) - (e) below:</p> <p><i>Guidance note: If the substantive application is to be lodged by more than 1 person, the reference to the</i></p>		Not applicable – the application has no relevance to this clause.

	<p><i>applicant in subclause (2)(d) is to the person who is to be identified in the application as the person proposed to exchange land (clause 23(2) of Schedule 6).</i></p> <p>a) a description of both land areas proposed for exchange (for example, maps showing areas and location, addresses, and legal descriptions where possible:</p>		
	b) the financial value of the land proposed to be acquired by the Crown:		Not applicable – the application has no relevance to this clause.
	c) a brief description of the conservation values of both pieces of land, including an explanation of why the exchange would benefit the conservation estate:		Not applicable – the application has no relevance to this clause.
	d) if the land exchange would trigger a right of first refusal or a right of offer or return, confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return that the holder has agreed to waive that right for the purpose of the land exchange:		Not applicable – the application has no relevance to this clause.
	<p>e) confirmation by the applicant that no part of any land to be exchanged by the Crown is –</p> <p>(iii) land listed in Schedule 4; or</p> <p>(iv) a reserve declared to be a national reserve under section 13 of the Reserves Act 1977</p>		Not applicable – the application has no relevance to this clause.
13(4)(y)(vi), clause 2 of Schedule 9	<p>Standard or complex freshwater fisheries activity approval</p> <p>(1) The information required to be provided under section 13(4)(y)(vi) is the following:</p>		Not applicable – the application has no relevance to this clause.

	<p>(a) whether an in-stream structure is proposed (including formal notification of any dam or diversion structure) and the extent to which this may impede fish passage; and</p> <p>(b) whether any fish salvage activities or other complex freshwater fisheries activities are proposed.</p>		
13(4)(y)(vii), clause 2 of Schedule 10	<p>Marine consent</p> <p>The information required to be provided under section 13(4)(y)(vii) is–</p> <p>(a) information about whether the Minister of Conservation is an affected person:</p>		Not applicable – the application has no relevance to this clause.
	<p>(b) additional information about whether the applicant has already made an application for a consent under the EEZ Act in relation to the project, and, if so,—</p> <p>(a) details of any application made; and</p> <p>(b) the decisions made on that application; and</p> <p>(c) information about the matters that the Minister may consider under section 22(6):</p>		Not applicable – the application has no relevance to this clause.
	<p>(c) additional information (in a summary form) about compliance or enforcement action taken against the applicant by the EPA under the EEZ Act.</p> <p>Guidance note: If the application is to be lodged by more than 1 person, the reference to the applicant in subclause (1)(b) is to the person who is to be identified in the application as the proposed holder of the</p>		Not applicable – the application has no relevance to this clause.

	marine consent (clause 2(2) of Schedule 10).		
13(4)(y)(viii), clause 2 of Schedule 11	<p>Access arrangement</p> <p>(i) Confirmation that the applicant has complied with section 12(2) (for the purposes of section 13(4)(y)(viii)).</p> <p><i>Guidance note: If the referral application is to be lodged by more than 1 person, the reference to the applicant in subclause (1) is to the person who is to be identified in the application as the proposed holder of the access arrangement (clause 2(2) of Schedule 11).</i></p>		Not applicable – the application has no relevance to this clause.
13(4)(y)(ix), clause 15 of Schedule 11	<p>Mining permit</p> <p>(1) For the purposes of section 13(4)(y)(ix), the information is—</p> <p>(a) a copy of the relevant exploration permit or existing privilege to be exchanged for a mining permit that entitles the holder to mine a Crown owned mineral:</p> <p>(b) the name and contact details of the proposed permit participants and the proposed permit operator:</p> <p>(c) a proposed work programme for the proposed permit, which may comprise committed work, committed or contingent work, or both:</p> <p>(d) evidence of the technical or financial capability of the proposed permit holder to comply with and give proper effect to the work programme:</p> <p>(e) information about the proposed permit holder’s history of compliance with mining or similar permits</p>		Not applicable – the application has no relevance to this clause.

<p>and their conditions:</p> <p>(f) the proposed date on which the substantive application is intended to be lodged:</p> <p>(g) if the authorised person proposes to provide information under section 37, the date on which the person intends to provide that information:</p> <p>(h) The proposed duration of the permit:</p> <p>(i) if the proposed approvals include a mining permit for petroleum,—</p> <p>(i) a map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be same area as the area over which the mining permit application is intended to be made), and the extent of the resource to which the development plan relates:</p> <p>(ii) the resources and reserves relating to the project, estimated in accordance with the Petroleum Resources Management System:</p> <p>(iii) a high-level overview of the following:</p> <p>(A) the proposed field development plan:</p> <p>(B) the proposed date for the commencement of petroleum production:</p> <p>(C) the economic model for the project:</p>		
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	<p>(D) the proposed duration of the proposed mining permit:</p> <p>(E) decommissioning plans:</p> <p>(j) if the proposed approvals include a mining permit for minerals other than petroleum,—</p> <p>(i) a map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be same area as the area over which the mining permit application is intended to be made), and the extent of the resource and reserves to which the development plan relates:</p> <p>(ii) for minerals other than gold or silver, a report or statement confirming the ownership of the minerals targeted:</p> <p>(iii) whether the application will be for a Tier 1 or Tier 2 permit:</p> <p>(iv) an estimate of the mineral resources and reserves relating to the project, including a summary on acquisition of the data and the data underpinning the estimate (such as information on sample locations, grade, and geology):</p> <p>(v) an indicative mine plan:</p> <p>(vi) a high-level overview of the following:</p>		
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	<p>(A) the proposed mining method:</p> <p>(B) the proposed date for the commencement of mining and estimated annual production:</p> <p>(C) the economic model for the project:</p> <p>(D) the status of or anticipated timing for completing any prefeasibility or feasibility studies:</p> <p>(E) the proposed methods for processing mined material and handling and treating waste:</p> <p>(F) anticipated plans for mine closure and rehabilitation.</p> <p>(2) For the purpose of subclause (1)(j)(iv), for a Tier 1 permit application the resources and reserves relating to the project are to be estimated in accordance with a recognised reporting code such as JORC or NI 43-101</p>		
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Appendix 2: Consultation Summary

The following agencies were consulted with to inform the assessment of the application for completeness. Each agency was requested to confirm whether the application documentation provided by the EPA regarding the proposal as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose of the Act in accordance with section 44 of the Act.

Christchurch Regional Council have assessed and despite some gaps, considers the application to include sufficient information for assessment purposes.

Christchurch City Council (CCC) initially identified several missing pieces of information, largely relating to the assessment of effects on the environment and mitigation measures. After further consultation, CCC has accepted that appropriateness of assessment and viability of mitigation measures can additionally be raised in comments under s53(2)(a), with opportunity for the applicant to respond under s55(2), requested as further information by the panel under s67(1), if the application is determined to be complete, with further opportunity to comment on the specifics of conditions under s70(1).

The Ministry for Environment did not respond to the consultation request.

The Department of Conservation (DOC) noted gaps in the information provided for a wildlife approval, particularly due to a lack of survey data on lizard habitats. DOC emphasized that these gaps could materially impact their assessment and recommended further detail on methods and relocation data, especially for the Canterbury Spotted Skink.

- 1. Consultation with Environment Canterbury Regional Council and Christchurch City Council** as the relevant consent authorities and the **Ministry for the Environment** as the administering agency for the following approvals under the Resource Management Act 1991:
 - Resource consent (section 42(4)(a) of the Act)

Response from Environment Canterbury Regional Council

Please find the response to the specific questions raised in the above letter from the Canterbury Regional Council (CRC).

- 1. Specific questions relating to this application in accordance with section 30 of the Act) Confirm that the written notice prepared by Council remains accurate at final at the time of receiving this letter.**

CRC can confirm that the information contained in the written notice (dated 21 February 2025) remains accurate as at the date of this letter.

- 2. The substantive application includes applications for the following approvals under the Resource Management Act 1991 (RMA) that Environment Canterbury Regional Council is the relevant consent authority for: a resource consent that would otherwise be applied for under the RMA (section 42(4)(a) of the Fast Track Approvals Act ('Act')).**

Key elements of the proposal, which would require CRCs consideration, include:

- a. Earthworks (including those over a HAIL site).
- b. Damming, diversion, take and discharge within the Paparua Water Race along Ryans Road. The Paparua water race is a stockwater race and is classified as an artificial waterway
- c. Construction phase and operational stormwater discharge.

Based on the information provided in the substantive application (and its Appendices), CRC considers that rules within the Canterbury Land and Water Regional Plan (LWRP) and the Canterbury Air Regional Plan (CARP), would apply.

CRC considers that the relevant documents identified by Carter Group in paragraph 117 of the Assessment of Environmental Effects (AEE) is correct, and that Carter Group have assessed their proposal against the relevant Plans with regards to regional consenting.

The table in **Appendix A** of this letter, identifies the specific rules triggered in the above plans by the proposed activities, and the consents that would be required by the CRC under those rules.

As detailed in **Appendix A**, CRC considers that the assessment contained in Appendix 19 incorrectly assesses the proposal against Rules 5.116-5.118 in terms of the take and use of water and does not properly identify the relevant rules in the LWRP for the diversion, discharge and damming of the Paparua Water Race to enable/carryout works.

Rules 5.116-5.118 seek to control a take for the purpose of construction (e.g. dust suppression), not the diversion of the Paparua Water Race, installation of the pipe and associated damming, take, diversion and discharge related to these works.

CRC consider that the correct rules to assess the proposed activities relating to the Paparua Water Race would be:

- a. Rule 5.127 – Non-consumptive taking and using of water from a... artificial watercourse and discharge of the of the same water to the same... artificial watercourse that does not meet one or more of the conditions in Rule 5.126 is a non-complying Activity.
 - i. Section 14 consent related to the take and use of water – Non-Complying
 - ii. Section 15 consent related to the discharge of that water – Non-Complying
- b. Rule 5.141A – the placement, installation... of any structure, excluding dams... or any diversion or discharge in an artificial watercourse, that does not comply with Rules 5.135 to 5.141 is a discretionary activity.
 - i. Section 14 consent related to the diversion of water – Discretionary
 - ii. Section 15 consent related to the discharge of water within the artificial watercourse – Discretionary
- c. Rule 5.154 – The damming of water... and the constructing, using, altering, maintaining and operating of dam structures within the bed of a river, including any damming or impounding of water outside of the bed of the river or natural lake is a permitted activity, provided the following conditions are met...
 - i. Section 14 consent related to the damming of water (within the Paparua Water Race to enable works) - Permitted

Based on this assessment above, Carter Group would require the following consents:

Section 9 Consent (Land Use Consent):

- Earthworks over aquifers – **Restricted Discretionary**

Section 14 Consent (Water Permit):

- Non-Consumptive take and use related to diversion of Paparua Water Race – **Non-Complying**
- Diversion of Paparua Water Race – **Discretionary**
- Damming of the Paparua Water Race – **Permitted**

Section 15 Consent (Discharge Consent):

- Discharge of water from the (non-consumptive) take of water from the Paparua Water Race to enable diversion – **Non-Complying**
- Discharge of water within the Paparua Water Race – **Discretionary**

3. Whether that substantive application made available to CRC, meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

CRC notes that while the substantive application (and **Appendix 19**), has not assessed the proposal against Rules 5.127, 5.141A and 5.154 (which would trigger consent), this would not alter the overall activity status (Non-Complying) of the proposal.

It is also considered that the information provided in the substantive application (including appendices) is considered to include sufficient information relating to the activity, including as assessment of the activities effects in accordance with s88 of the RMA.

We trust that this information assists you determining the completeness of the application regarding the Ryans Road Industrial Development, from Carter Group Limited, under section 46(1) of the Act.

Please advise if you need any further clarification on any matters raised in this letter.

We look forward to working with you further on this application if it is considered to meet section 46(1) of the Act.

Appendix A – Rules triggered in the LWRP and CARP

Canterbury Land and Water Regional Plan (LWRP)		
Rule Trigger	Proposed Activity	Consent Requirement
<p>5.94B – The discharge of construction-phase stormwater, other than into or from a reticulated stormwater system, into a surface waterbody, or onto or into land in circumstances where a contaminant may enter groundwater or surface water, that does not meet one or more of the conditions of Rule 5.94A is a restricted discretionary activity.</p> <p><i>The exercise of discretion is restricted to the following matters:</i></p> <p><i>The actual and potential effects of the discharge on the quality of surface water, aquatic ecosystems, Ngāi Tahu cultural values; and</i></p> <p><i>The actual and potential effects of the discharge on the quality and safety of human and animal drinking water; and</i></p> <p><i>The actual and potential adverse environmental effects of the quantity of water to be discharged on the banks or bed of a waterbody or on its flood carrying capacity, and on the capacity of the network to convey that discharge; and</i></p> <p><i>The potential benefits of the activity to the applicant, the community and the environment</i></p>	<p>Discharge of construction phase stormwater</p>	<p>Consent required under s15 of the RMA</p> <p>Restricted Discretionary Activity</p>
<p>5.97 – The discharge of stormwater, other than from a reticulated stormwater system, into a river, lake, wetland or artificial watercourse or onto or into land in circumstances where a contaminant may enter water that does not meet one or more of the conditions of Rule 5.95 or Rule 5.96; and the discharge of stormwater or construction-phase stormwater into a reticulated stormwater system that does not meet the condition of Rule</p>	<p>Discharge of stormwater from roads, berms and footpaths to ground from two catchment areas within the site, via a reticulated network for</p>	<p>Consent required under s15 of the RMA</p> <p>Non-Complying Activity</p>

<p>5.93A; is a discretionary activity except that within the boundaries of Christchurch City it is a non-complying activity.</p>	<p>treatment and attenuation to of two first flush infiltration basin/ soakpit systems.</p>	
	<p>Discharge of operational stormwater Discharge of stormwater from lots will be directed to an onsite proprietary treatment device for treatment of the ‘first flush’ flow prior to disposal to ground via soak pits.</p>	<p>Consent required under s15 of the RMA</p> <p>Non-Complying Activity</p>
<p><i>5.154 The damming of water in the bed of a river and the constructing, using, altering, maintaining and operating of dam structures within the bed of a river, including any damming or impounding of water outside the bed of a river or natural lake is a permitted activity, provided the following conditions are met: For the damming or impounding of water outside the bed of a river or natural lake:</i></p>	<p>Damming of water from the Paparua Water Race to enable piping along the length</p>	<p>Consent not required for the damming of water to enable the temporary diversion as, based on the substantive application, the proposed activity would</p>

	<p><i>the volume of water impounded is less than 20,000 m³ ; or the maximum depth of water impounded above ground level (measured as the maximum vertical distance between the crest of the dam and the ground level immediately adjacent to dam) is less than 4 m; and if the volume of water impounded is greater than 1,000 m³ , the design and construction of the dam is certified by a Recognised Engineer; and the land is not contaminated or potentially contaminated. For the damming of water in the bed of a river and the constructing, altering, using, maintaining and operating of dam structures within the bed of a river: the volume of water impounded is less than 5,000 m³ ; and the maximum depth of water is less than 3 m; and the dam does not impound the full flow of the river; and any existing passage of fish is not impeded; and the damming of water does not cause water flow to fail to meet any limits in Sections 6 to 15 or fall below the minimum flow for the surface waterbody if the waterbody is subject to a minimum flow as set out in Sections 6 to 15; and the dam is not located in a river listed as a high naturalness river in Sections 6 to 15 or in the mainstem of any river; and the damming does not prevent water being taken by any domestic or stock water supply, or reduce the reliability of supply of any existing legally authorised water take</i></p>		<p>meet the permitted activity standards of Rule 5.154.</p> <p>Permitted Activity</p>	
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<p>5.126 The non-consumptive taking and use of water from a lake, river or artificial watercourse and discharge of the same water to the same lake, river or artificial watercourse is a restricted discretionary activity, provided the following conditions are met:</p> <p><i>Limits have been set for that surface waterbody in Sections 6 to 15 or the lake or river is subject to a Water Conservation Order; and</i></p> <p><i>The taking of water and subsequent discharge does not result in any exceedance of any limit set for that waterbody in Sections 6 to 15 or flow and allocation regime set out in the Water Conservation Order; and</i></p> <p><i>Other than for the replacement of existing consents for activities provided for under Policy 4.51, the maximum distance from the point of take to the point of discharge is not more than 250 m; and</i></p> <p><i>Other than for the replacement of existing consents for activities provided for under Policy 4.51, the take is not from a wetland, hāpua or a high naturalness lake or river that is listed in Sections 6 to 15.</i></p>	<p>Take of water from the Papanui Water Race to enable piping along the length</p>	<p>It is not considered that the proposed activity will meet Rule 5.126(3), and therefore Rule 5.127 would apply.</p> <p>Consent requirement under s14 of the RMA</p> <p>Non-Complying Activity</p>
	<p>Discharge of diverted/ over-pumped water from the Papanui Water Race to enable piping along the length</p>	<p>It is not considered that the proposed activity will meet Rule 5.126(3), and therefore Rule 5.127 would apply.</p>
<p>5.127 – The non-consumptive taking and use of water from a lake, river or artificial watercourse and discharge of the same water to the same lake, river or artificial watercourse that does not meet one or more of the conditions in Rule 5.126 is a non-complying activity</p>		<p>Consent requirement under s15 of the RMA</p> <p>Non-Complying Activity</p>

<p>5.140 Unless addressed by another rule in this Plan, the installation, alteration, extension, or removal of temporary structures and diversions associated with undertaking activities in Rules 5.135 to 5.139, military training activities, or artificial watercourses are permitted activities, provided the following conditions are met:</p> <p><i>The activity is not undertaken in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Critical Habitat; and</i></p> <p><i>The temporary structure and diversion is in place for not more than 4 weeks in any 12 month period; and</i></p> <p><i>The activity does not prevent any existing fish passage or result in the stranding of fish; and</i></p> <p><i>Any diversion of water out of a river channel does not reduce the wetted width of that existing channel by more than 25% at any point; and</i></p> <p><i>For any temporary culvert in a river:</i></p> <p><i>The maximum length of the culvert is 14m; and</i></p> <p><i>The culvert is an open bottom culvert, or the base of the culvert is embedded below bed level by 25% to 50% of the culvert height and is covered with water at the estimated 7DMALF; and</i></p> <p><i>The maximum width of the river bed at the point of the crossing is 5 m; and</i></p> <p><i>The activity is not in a river, lake or artificial watercourse managed for flood control or drainage purposes unless written permission has been obtained from the authority responsible for maintaining the flood and drainage carrying capacity of that water body or watercourse.</i></p>	<p>Diversion of water from the Paparua Water Race to enable piping along the length</p>	<p>Rules 5.135-5.139 apply only to the beds of rivers (the Paparua Water is an Artificial Water Course). Based on the substantive application, the proposed diversion would not meet Rule 5.140(2), 5.140(3) and therefore Rule 5.141A would apply.</p> <p>Consent requirement under s14 of the RMA</p> <p>Discretionary Activity</p>	
	<p>Discharges associated with the temporary diversion resulting from the Paparua Water Race to enable piping along the length</p>	<p>Rules 5.135-5.139 apply only to the beds of rivers (the Paparua Water is an Artificial Water Course). Based on the substantive application, the proposed diversion would not meet Rule 5.140(2), 5.140(3) and therefore Rule 5.141A would apply.</p>	

<p>5.141A – The placement, installation, erection, reconstruction, alteration or removal of any structure, excluding dams, on, in or under the bed of a lake or river, and including any associated excavation, disturbance, diversion and discharge in the bed of a lake or river, or any diversion or</p>		<p>Consent requirement under s15 of the RMA</p> <p>Discretionary Activity</p>	
<p>discharge in an artificial watercourse, that does not comply with Rules 5.135 to 5.141 is a discretionary activity.</p>	<p>Installation of a culvert in Paparua Water Race</p>	<p>Rules 5.135-5.139 apply only to the beds of rivers (the Paparua Water is an Artificial Water Course). Based on the substantive application, the proposed diversion (being required to enable culvert installation) would not meet Rule 5.140(2), 5.140(3) and therefore Rule 5.141A would apply.</p> <p>Consent requirement under s14 of the RMA</p> <p>Discretionary Activity</p>	

<p>5.175 – The use of land to excavate material is a permitted activity, provided the following conditions are met:</p> <p><i>Over the Coastal Confined Gravel Aquifer System, as shown on the Planning Maps:</i></p> <p><i>there is more than 1 m of undisturbed material between the deepest part of the excavation and Aquifer 1; and</i></p> <p><i>if more than 100 m³ of material is excavated, the excavation does not occur within 50 m of any surface waterbody; or</i></p> <p><i>Over an unconfined or semi-confined aquifer:</i></p> <p><i>the volume of material excavated is less than 100 m³ ; or the volume of material excavated is more than 100 m³ and:</i></p> <p><i>there is more than 1 m of undisturbed material between the deepest part of the excavation and the highest groundwater level; and</i></p> <p><i>the excavation does not occur within 50 m of any surface waterbody.</i></p> <p>5.176 – The use of land to excavate material that does not comply with one or more of the conditions of Rule 5.175 is a restricted discretionary activity. The exercise of discretion is restricted to the following matters:</p> <p><i>The actual and potential adverse environmental effects on the quality of water in aquifers, rivers, lakes, wetlands; and</i></p> <p><i>Any need for remediation or long-term treatment of the excavation; and</i></p> <p><i>The protection of the confining layer and maintaining levels and groundwater pressures in any confined aquifer, including any alternative methods or locations for the excavation; and</i></p> <p><i>The management of any exposed groundwater; and</i></p> <p><i>Any adverse effects on Ngāi Tahu values or on sites of significance to Ngāi Tahu, including wāhi tapu and wāhi taonga.</i></p>	<p>Earthworks over an unconfined/ semi-confined aquifer</p>	<p>Based on the substantive application, the proposed earthworks to enable infrastructure, piping and diversion would not comply with Rule 5.175(2)(b)(ii) and the volume overall exceed 100m³, and being within 50m of the Paparua Water Race. Therefore, rule 5.176 would apply.</p> <p>Consent requirement under s9 of the RMA</p> <p>Restricted Discretionary Activity</p>	
	<p>Earthworks within riparian margins (Paparua Water Race, Ryans Rd)</p>	<p>Based on the substantive application, the proposed earthworks to enable infrastructure, piping and diversion would not comply with Rule 5.175(2)(b)(ii) and the volume overall exceed</p>	

		<p>100m³, and being within 50m of the Paparua Water Race. Therefore, rule 5.176 would apply.</p> <p>Consent requirement under s9 of the RMA</p> <p>Restricted Discretionary Activity</p>
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Canterbury Air Regional Plan (CARP)		
Relevant Rule	Proposed Activity	Consent Requirement
<p>7.32 – The discharge of dust to air beyond the boundary of the property of origin from the construction of buildings, land development activities, unsealed surfaces or unconsolidated land, is a permitted activity provided the following conditions, where applicable, are met:</p> <p><i>The building to be constructed is less than 3 stories in height, or where the building is greater than 3 stories in height, a dust management plan is prepared in accordance with Schedule 2 and implemented by the person responsible for the discharge into air; and</i></p> <p><i>The area of unsealed surface or unconsolidated land is less than 1000m², or where the area of unsealed surface or unconsolidated land is greater than 1000m² a dust management plan is prepared in accordance with Schedule 2 and implemented by the person</i></p>	<p>Earthworks activities</p>	<p>Based on the substantive application, the proposed earthworks would be managed in a manner which would achieve compliance with Rule 7.32.</p> <p>No consent required</p> <p>Permitted Activity</p>

responsible for the discharge into air; and The discharge does not cause an offensive or objectionable effect beyond the boundary of the property of origin, when assessed in accordance with Schedule 2.

Response from Christchurch City Council

The purpose of this letter is to comment on the completeness of the application made by the Carter Group in relation to a proposal to subdivide and use land at 104 Ryans Road and 20 Grays Road, Harewood.

I have carried out an assessment of completeness against the matters in Schedule 5 as they relate to the functions of the Christchurch City Council as territorial authority.

I refer you to the assessment attached as Appendix 1 and note that it appears some required information has not been provided, and the application may not be complete in relation to approvals sought for resource consent. In brief, this includes: In relation to Schedule 5 clause 5(1)(k) A number of proposed conditions reference appendices incorporating Christchurch District Plan provisions however no appendices are included with the draft conditions.

In relation to Schedule 5 clause 5(4)(a) – further referencing Clause 6(1)(a)-- The Assessment of Environmental Effects refers to a Construction Noise and Vibration Management Plan required via conditions, relying on this to mitigate effects, however the proposed condition set does not include the requirement for a Construction Noise and Vibration Management Plan to be provided. For completeness, it is noted that a condition requiring a Construction Noise and Vibration Management Plan would otherwise accord with Council practice.

A detailed baseline survey for the presence of herpetofauna is referred to in the Assessment of Environmental Effects with a completion date of late March 2025, where it is identified it will be provided to the EPA. This baseline survey has not been provided with the application documents, however a lizard management plan has been provided. It is noted that adherence to a lizard management plan subject to Department of Conservation oversight accords with Council practice.

In relation to Schedule 5 clause 5(4)(a) – further referencing Clause 6(1)(d)-- The construction of a roundabout is proposed as mitigating the overcapacity intersection of Ryans Road and Pound Road, however the construction of this roundabout is not included in the Council's capital program and is not currently funded, nor is it proposed in this application. Measures to implement this mitigation should be identified, or additional assessment be provided

assuming this upgrade will not be in place. The modelling identifies a bottleneck at the roundabout on SH73 and Pound Road, as well as the signalised intersection of SH73 and SH1. Mitigation measures identified require the NZTA to undertake upgrades at this intersection. Measures to implement this mitigation should be identified, or additional assessment be provided assuming this upgrade will not be in place. In relation to Schedule 5 clause 5(4)(b) – further referencing Clause 7(a) – Within the Integrated Transport Assessment (Appendix 10) it is assumed that the speed limits along Ryans Road and Grays Road will be reduced from 80km/h to 50km/h or 60km/h and the proposal is assessed on this basis, however a change of speed limit is not sought in this application or otherwise approved by Council. The ITA should include an assessment based on the current speed limit.

The development will create a shortfall for future water supply capacity to support growth of land zoned for development elsewhere under the current District Plan, as outlined to the applicant during consultation and specified in the 'Ryans Road Industrial Park – Development: Water Supply Modelling Assessment' attached as Appendix D to Appendix 12 of the application. The effects associated with this shortfall are not assessed and mitigation measures are not proposed.

Additionally, the application proposes mitigation of effects relating to a number of matters via conditions of consent and consent notice, where relevant. This approach accords with Christchurch City Council practice and is considered to be acceptable by relevant specialists. In brief, this includes: In relation to Schedule 5 clause 5(4)(a) – further referencing Clause 6(1)(d) – The Detailed Site Investigation identifies the need for a Remediation Action Plan (RAP). No RAP has been provided with the application, however a condition requiring the preparation of an RAP and submission of this plan to Christchurch City Council prior to works occurring is volunteered.

A number of conditions proposed in relation to the land use consent (as opposed to subdivision consent) to mitigate effects relating to the safety of aircraft (outdoor lighting, protection surfaces, and wildlife management) are proposed to be secured on an ongoing basis by way of consent notice, in particular to alert the owners of on-sold property as to their obligations under the consent. It is highlighted that there is no opportunity to place a consent notice on the title of an allotment as part of a land use consent. Notwithstanding, Council would otherwise support adoption of a different legal mechanism to provide for a similar outcome.

Further, it is noted that a portion of the site proposed to be subdivided is within designation D1 – Christchurch International Airport and written approval from the requiring authority, Christchurch International Airport Limited, has not been provided.

For completeness, it is highlighted that while some information may not be required to apply for consent, it would be required for Council to accept assets to vest. In particular, the Assessment of Groundwater Effects has only analysed infiltration system effects on water supply bores and wells within 500m of the site. Should the applicant wish to vest stormwater infiltration facilities with Christchurch City Council, as is required to manage stormwater disposal from public roads, they will need to comply with Condition 32 of the Comprehensive Stormwater Network Discharge Consent (CRC252424) held by the Council. The Comprehensive Stormwater Network Discharge Consent requires a site-specific assessment of contamination risk for infiltration systems located within 2km upgradient of water supply bores. Alternatively, the stormwater basins could be retained in private ownership, provided roads within the development were not vested but rather created as private roads. This would require an additional assessment of the appropriateness of private roads and stormwater basins, which has not been provided.

I trust this assists in deciding whether the application is complete and within scope in accordance with section 46.

Schedule 5 Clause 5 – Information required in consent application

	Description	Comment on information provided	Complete (Y / N / NA)
Sch 5 cl 5(1)	For the purposes of section 43(3)(a), a consent application must include the following information:		
Sch 5 cl 5(1)(a)	A description of the proposed activity.	A description of the proposal is provided in paragraphs 62-107 of the AEE.	Y

Sch 5 cl 5(1)(b)	A description of the site at which the activity is to occur including whether the site is adjacent to: (i) A statutory area (as defined in the relevant Treaty settlement Act); or (ii) Ngā rohe moana o ngā hapū o Ngāti Porou; or (iii) A protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011.	A description of the site is provided in paragraphs 28-61 of the assessment of environmental effects. The site is not in proximity to a statutory area, Ngā rohe moana o ngā hapū o Ngāti Porou, or a protected customary rights area.	Y
Sch 5 cl 5(1)(c)	Confirmation that the activity complies with section 46(2)(a), (b), and (d).		
	s 46(2)(a) – the application complies with sections 42, 43, 44: 42 – Authorised person may lodge substantive application for approval 43 – Requirements for substantive application 44 - Information must be specified in sufficient detail	Confirmation that the activity complies with section 46(2)(a), (b), and (d) is provided in the covering letter to the application.	Y
	S46(2)(b) – the application relates solely to a listed or referred project.	Yes, the application as described in paragraphs 62- 107 of the AEE accords with that in Schedule 2 of the FTAA.	Y

s46(2)(d) – any fee, charge or levy payable under regulations in respect of the application is paid.		N/A
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Schedule 5 Clause 5 – Information required in consent application

	Description	Comment on information provided	Complete (Y / N / NA)
Sch 5 cl 5(1)(d)	The full name and address of: (i) Each owner of the site and land adjacent to the site; and (ii) Each occupier of the site and of land adjacent to the site whom the applicant is unable to identify.	The full name and address of all owners and occupiers of the application site are not stated. A Record of Title with the names of the registered owners has been provided. A list of owners and occupiers of neighbouring properties has been provided an Appendix 35. Properties where the applicant has not identified occupiers have been identified.	N

Sch 5 cl 5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates.	The application states that no other activities are part of the proposal to which the consent application relates.	N/A
Sch 5 cl 5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates.	The application states that no other resource consents, notices of requirement for designations or alterations to designations are required in relation to the activity.	N/A
Sch 5 cl 5(1)(g)	An assessment of the activity against sections 5, 6, and 7 of the Resource Management Act 1991.	An assessment of the activity against section 5, 6, and 7 of the Resource Management Act 1991 is provided in paragraphs 388-394 of the AEE.	Y
Sch 5 cl 5(1)(h)	An assessment of the activity against any relevant provisions in any of the documents listed in subclause (2).	Refer subclause (2) table below.	

Sch 5 cl 5(1)(i)	Information about any Treaty settlements that apply in the area covered by the consent application, including: (i) identification of the relevant provisions in those Treaty settlements; and (ii) a summary of any redress provided by those settlements that affects natural and physical resource relevant to the project or project area.	Information about any Treaty settlements that apply in the area covered by the consent application has not been provided. This includes identification that provisions and redress are not applicable to the application.	N
Sch 5 cl 5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011.		N/A
Sch 5 cl 5(1)(k)	The conditions that the applicant proposes for the resource consent.	<ul style="list-style-type: none"> - The applicant has provided a set of draft conditions in Appendix 18. - Conditions 3, 4, 6, 8, 9, 10, 12, 13, 14, 15, and 16 proposed in relation 	N

		to the land use consent sought under the Christchurch District Plan refer to plan provisions which are to be attached as appendices to the decision. The appendices have not been provided with the condition set.	
Sch 5 cl 5(1)(l)	If a notice under section 30(3)(b) or (5) has been received: (i) a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and (ii) if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware of about the existing resource consent referred to in the notice.	The applicant has provided a copy of the notice provided under section 30(3)(b) by the Christchurch City Council on 20 February 2025, and the application has been lodged less than 3 months after the date of that notice. <i>Note: This relates only to the notice under section 30(3)(b) issued by the Christchurch City Council.</i>	Y
Sch 5 cl 5(2)	Documents referred to in subclause (1)(h).	Refer subclause (2) table below.	

Sch 5 cl 5(3)	Assessment criteria for documents referred to in subclause (2).	Refer subclause (2) table below.	
Sch 5 cl 5(4)	A consent application must include an assessment of the activity's effects on the environment that: (a) includes the information required by clause 6; and (b) covers the matters specified in clause 7.	Refer clause 6 & 7 tables below.	
Sch 5 cl 5(5)	A consent application must also include the following information:		
Sch 5 cl 5(5)(a)	if a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under section 87A(1) of the Resource Management Act 1991); and	The applicant has provided an assessment of the proposal against Christchurch District Plan provisions in Appendix 19. This appendix identifies where consent is required and where part of the proposal complies with Christchurch District Plan standards, including with	Y

		reference to specialist reports.	
Sch 5 cl 5(5)(b)	if the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set out in that document; and		N/A

Sch 5 cl 5(5)(c)	if the activity is to occur in an area that is a taiāpure-local fishery, a mātaihai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.		N/A
Sch 5 cl 5(6)	If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the applicant must include a statement to that effect.		N/A
Sch 5 cl 5(7)	If the substantive application is to be lodged by more than 1 authorised person, the references to the applicant in subclauses (1)(d), (k), (l) and (6) must be read as references to the authorised person who is to be identified in the application as the proposed holder of the resource consent.		N/A
Schedule 5 Clause 5(2) – Documents referred to in subclause (1)(h), in accordance with subclause (3)			

	Description	Comment on information provided	Complete (Y / N / NA)
Sch 5 cl 5(2)	The documents referred to in subclause (1)(h) are the following:		
Sch 5 cl 5(2)(a) - A national environmental standard.	Relevant national environmental standards: - Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES-CS)		
	Any relevant objectives, policies or rules.	The AEE includes an assessment of the proposal in relation to the NES-CS at paragraphs 118-123.	Y
	Any requirement, condition, or permission in any rules.		N/A
	Any other requirements.	A detailed site investigation is provided in Appendix 06.	Y
Sch 5 cl 5(2)(b) - Other regulations made under the Resource Management Act 1991.	N/A – No other regulations made under the RMA are relevant to the proposal.		
	Any relevant objectives, policies or rules.		N/A
	Any requirement, condition, or permission in any rules.		N/A
	Any other requirements.		N/A

Sch 5 cl 5(2)(c)
 - A national policy statement.

Relevant National Policy Statements: - National Policy Statement for Freshwater Management 2020 (NPS-FM) - National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB) - National Policy Statement for Highly Productive Land 2022 (NPS-HPL) - National Policy Statement for Urban Development 2020 (NPS-UD)		
Any relevant objectives, policies or rules.	An assessment in terms of the objectives and policies of the above policy statements is provided in Appendix 32 and in paragraphs 335-351 of the AEE.	Y
Any requirement, condition, or permission in any rules.		N/A
Any other requirements.		N/A
N/A – The site is not in proximity to the CMA		
Any relevant objectives, policies or rules.		N/A
Any requirement, condition, or permission in any rules.		N/A
Any other requirements.		N/A

Sch 5 cl 5(2)(d)
 - A New Zealand coastal policy statement.

Sch 5 cl 5(2)(e)
 - A regional policy statement or proposed regional policy statement.

Relevant RPS: - Canterbury Regional Policy Statement (CRPS)		
Any relevant objectives, policies or rules.	An assessment of the relevant objectives, policies and methods of the is provided in Appendix 32 and in paragraphs 352-356 of the AEE.	Y
Any requirement, condition, or permission in any rules.		N/A
Any other requirements.		N/A

Sch 5 cl 5(2)(f)
 - A plan or proposed plan.

Relevant Plans: - Canterbury Land and Water Regional Plan - Canterbury Air Regional Plan - Christchurch District Plan		
Any relevant objectives, policies or rules.	An assessment of compliance against regional and district plans is provided in Appendix 4. An assessment of the rules for which resource consent is required under regional and district	Y

Sch 5 cl 5(2)(g)
 - A planning document recognised by a relevant iwi authority and lodged with a local authority.

		plans is provided at paragraphs 124-129.	
	Any requirement, condition, or permission in any rules.		N/A
	Any other requirements.		N/A
Relevant documents: - Mahaanui Iwi Management Plan			
	Any relevant objectives, policies or rules.	An assessment of the relevant objectives and policies of the Mahaanui Iwi Management Plan is provided in Appendix 32 and at paragraphs 365-368 of the AEE	Y
	Any requirement, condition, or permission in any rules.		N/A
	Any other requirements.		N/A
Schedule 5 Clause 6 - Information required to assess environmental effects			
	Description	Comment on information provided	Complete (Y / N / NA)

Sch 5 cl 6(1)	The assessment of an activity's effects on the environment under clause 5(4) must include the following information:		
Sch 5 cl 6(1)(a)	An assessment of the actual or potential effects on the environment.	An assessment of effects on the environment has been provided. Refer to table below assessing the extent to which the AEE complies with Schedule 5 Clause 7 – <i>Matters to be covered in assessment of environmental effects.</i>	Y
Sch 5 cl 6(1)(b)	If the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use.	The activity does not include the use of hazardous installations.	N/A
Sch 5 cl 6(1)(c)	If the activity includes the discharge of any contaminant, a description of:	The approvals sought under the Christchurch District Plan do not include the discharge of any contaminant.	N/A
	(i) The nature of the discharge and the sensitivity of the receiving environment to adverse effects; and		

	(ii) Any possible alternative methods of discharge, including discharge into any other receiving environment.		
Sch 5 cl 6(1)(d)	A description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity.	<p>Mitigation measures are identified throughout the AEE and specialist reports, with mitigation proposed through design and required by conditions where relevant.</p> <p>However, a number of mitigation measures described are not able to be implemented, or are otherwise have not been provided with the application:</p> <ul style="list-style-type: none"> - Consent notices are proposed in relation to the land <p>The purpose of this letter is to comment on the completeness of the application made by the Carter Group in relation to a proposal to subdivide and use land at 104 Ryans Road and 20 Grays Road, Harewood. I have carried</p>	N

		<p>out an assessment of completeness against the matters in Schedule 5 as they relate to the functions of the Christchurch City Council as territorial authority. I refer you to the assessment attached as Appendix 1 and note that it appears some required information has not been provided, and the application may not be complete in relation to approvals sought for resource consent. In brief, this includes: In relation to Schedule 5 clause 5(1)(k)A number of proposed conditions reference appendices incorporating Christchurch District Plan provisions however no appendices are included with the draft conditions. In relation to Schedule 5 clause 5(4)(a) – further referencing Clause 6(1)(a)-- The Assessment of Environmental Effects</p>	
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		<p>refers to a Construction Noise and Vibration Management Plan required via conditions, relying on this to mitigate effects, however the proposed condition set does not include the requirement for a Construction Noise and Vibration Management Plan to be provided. For completeness, it is noted that a condition requiring a Construction Noise and Vibration Management Plan would otherwise accord with Council practice. A detailed baseline survey for the presence of herpetofauna is referred to in the Assessment of Environmental Effects with a completion date of late March 2025, where it is identified it will be provided to the EPA. This baseline survey has not been provided with the application documents, however a lizard</p>	
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		<p>management plan has been provided. It is noted that adherence to a lizard management plan subject to Department of Conservation oversight accords with Council practice. In relation to Schedule 5 clause 5(4)(a) – further referencing Clause 6(1)(d)-- The construction of a roundabout is proposed as mitigating the overcapacity intersection of Ryans Road and Pound Road, however the construction of this roundabout is not included in the Council’s capital program and is not currently funded, nor is it proposed in this application. Measures to implement this mitigation should be identified, or additional assessment be provided assuming this upgrade will not be in place. The modelling identifies a bottleneck at</p>	
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		<p>the roundabout on SH73 and Pound Road, as well as the signalised intersection of SH73 and SH1. Mitigation measures identified require the NZTA to undertake upgrades at this intersection. Measures to implement this mitigation should be identified, or additional assessment be provided assuming this upgrade will not be in place. In relation to Schedule 5 clause 5(4)(b) – further referencing Clause 7(a)-- Within the Integrated Transport Assessment (Appendix 10) it is assumed that the speed limits along Ryans Road and Grays Road will reduced from 80km/h to 50km/h or 60km/h and the proposal is assessed on this basis, however a change of speed limit is not sought in this application or otherwise approved by Council. The ITA should include an assessment</p>	
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		<p>based on the current speed limit. The development will create a shortfall for future water supply capacity to support growth of land zoned for development elsewhere under the current District Plan, as outlined to the applicant during consultation and specified in the 'Ryans Road Industrial Park – Development: Water Supply Modelling Assessment' attached as Appendix D to Appendix 12 of the application. The effects associated with this shortfall are not assessed and mitigation measures are not proposed. Additionally, the application proposes mitigation of effects relating to a number of matters via conditions of consent and consent notice, where relevant. This approach accords with Christchurch City Council</p>	
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		<p>practice and is considered to be acceptable by relevant specialists. In brief, this includes: In relation to Schedule 5 clause 5(4)(a) – further referencing Clause 6(1)(d)-- The Detailed Site Investigation identifies the need for a Remediation Action Plan (RAP). No RAP has been provided with the application, however a condition requiring the preparation of an RAP and submission of this plan to Christchurch City Council prior to works occurring is volunteered. A number of conditions proposed in relation to the land use consent (as opposed to subdivision consent) to mitigate effects relating to the safety of aircraft (outdoor lighting, protection surfaces, and wildlife management) are proposed to be secured on an ongoing basis by way of consent notice, in particular</p>	
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		<p>to alert the owners of on-sold property as to their obligations under the consent. It is highlighted that there is no opportunity to place a consent notice on the title of an allotment as part of a land use consent. Notwithstanding, Council would otherwise support adoption of a different legal mechanism to provide for a similar outcome. Further, it is noted that a portion of the site proposed to be subdivided is within designation D1 – Christchurch International Airport and written approval from the requiring authority, Christchurch International Airport Limited, has not been provided. For completeness, it is highlighted that while some information may not be required to apply for consent, it would be required for Council to</p>	
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		<p>accept assets to vest. In particular, the Assessment of Groundwater Effects has only analysed infiltration system effects on water supply bores and wells within 500m of the site. Should the applicant wish to vest stormwater infiltration facilities with Christchurch City Council, as is required to manage stormwater disposal from public roads, they will need to comply with Condition 32 of the Comprehensive Stormwater Network Discharge Consent (CRC252424) held by the Council. The Comprehensive Stormwater Network Discharge Consent requires a site-specific assessment of contamination risk for infiltration systems located within 2km upgradient of water supply bores. Alternatively, the stormwater basins could be</p>	
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		retained in private ownership, provided roads within the development were not vested but rather created as private roads. This would require an additional assessment of the appropriateness of private roads and stormwater basins, which has not been provided. I trust this assists in deciding whether the application is complete and within scope in accordance with section 46.	
Sch 5 cl	Identification of persons who may be affected by the	- The AEE does not separately identify persons who may be affected, however potentially affected persons are identified in relation to landscape and	Y
Schedule 5 Clause 6 – Information required to assess environmental effects			
	Description	Comment on information provided	Complete (Y / N / NA)

6(1)(e)	activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal.	visual effects (refer paragraph 167 of the AEE, and Appendix 11), and noise generation from industrial operations (refer paragraph 315 of AEE, and Appendix 04). - A record of consultation is provided in Appendix 24, while initial responses from Runanga are provided in Appendices 29 and 30.	
Sch 5 cl 6(1)(f)	If iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision.		N/A
Sch 5 cl 6(1)(g)	If the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved.	The AEE identifies at paragraph 379 that monitoring is specified in consent conditions.	Y
Sch 5 cl 6(1)(h)	An assessment of any effects of the activity on the exercise of a protected customary right.		N/A
Sch 5 cl 6(2)	A consent application need not include any additional information specified in a relevant policy statement or plan that would be required in an assessment of environmental effects under clause 6(2) or 7(2) of Schedule 4 of the Resource Management Act 1991.		
Schedule 5 Clause 7 – Matters to be covered in assessment of environmental effects			

	Description	Comment on information provided	Complete (Y / N / NA)
The assessment of an activity's effects on the environment under clause 5(4) must cover the following matters:			
Sch 5 cl 7(a)	Any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects.	The AEE includes an assessment of the following effects: <ul style="list-style-type: none"> - Economic effects and industrial land demand (paragraphs 139-161, Appendices 20, 21, 22). The AEE does not includes an assessment of the following effects: <ul style="list-style-type: none"> - The proposal will result in a shortfall in water supply capacity for other plan enabled development. 	N
Sch 5 cl 7(b)	Any physical effect on the locality, including landscape and visual effects.	The AEE includes an assessment of the following effects: <ul style="list-style-type: none"> - Landscape and Visual Amenity Effects (paragraphs 162-72, Appendix 11). - Urban Design Effects (paragraphs 173-177, Appendix 23). 	N

		<ul style="list-style-type: none"> - Lighting Effects (paragraphs 178-187, Appendix 15). - Transport Network Effects (paragraphs 188-203, Appendix 10). <ul style="list-style-type: none"> o Within the Integrated Transport Assessment (ITA, Appendix 10) it is assumed that the speed limits along Ryans Road and Grays Road will be reduced from 80km/h to 50km/h or 60km/h and the proposal is assessed on this basis, however a change of speed limit is not sought in this application. The ITA should include an assessment based on the current speed limit. o Additionally, the following uncertainties in the trip generation information provided have been identified: <ul style="list-style-type: none"> • The proposal includes 126 lots ranging from 1,000m² to 4.7ha, with trip generation based on the TRICS database using UK trip data. This estimates a two-way peak hour trip rate of 12.7-13.9 trips per hectare, resulting in a total of 8,804 trips per day, with 7-10% of those being heavy vehicle movements. It is not clear whether these trip rates 	
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have been validated and cross-referenced to ensure they are applicable to the New Zealand context.

- Given the significance of the proposed development and its impact on surrounding strategic transport infrastructure, a sensitivity test to assess the worst-case scenario effects would be expected.
- The sources of the traffic count data used in the SIDRA base year models is unclear.
 - Regionally Significant Infrastructure and Reverse Sensitivity Effects (paragraphs 204-235, Appendices 3, 4, 9).
 - Climate Change and Green House Gas Effects (paragraphs 236-239, Appendix 25).
 - Highly Productive Soils and Rural Production (paragraphs 240-249, Appendix 32).
 - Three Waters Infrastructure (paragraphs 250-264, Appendices 12 & 13).
 - Water Quality Effects

(paragraphs 265-273, Appendices 12, 13, 16, 27).

Sch 5 cl 7(c)	Any effects on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity.	The AEE includes an assessment of the following effects: <ul style="list-style-type: none">- Herpetology (paragraphs 274-279, Appendix 7). Note that a detailed baseline survey for the presence of herpetofauna has not been provided.- Freshwater (paragraphs 280-85, Appendix 8).- Avifauna (paragraphs 286-288, Appendix 9).	N
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Sch 5 cl 7(d)	Any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value for present or future generations.	The AEE includes an assessment of the following effects: - Cultural Effects (paragraphs 290-297, Appendix 28, and preliminary feedback from Te Ngāi Tūāhuriri Rūnanga and Te Taumutu Rūnanga provided in Appendices 29-30).	Y
Sch 5 cl 7(e)	Any discharge of contaminants into the environment and options for the treatment and disposal of contaminants.	The AEE includes an assessment of the following effects: - Earthworks (paragraphs 298-305, Appendices 14 & 16). - Contaminated Soil (paragraphs 306-312, Appendix 6).	Y
Sch 5 cl 7(f)	Any unreasonable emission of noise.	The AEE includes an assessment of the following effects: - Noise effects (paragraph 313-321, Appendix 4).	Y
Sch 5 cl 7(g)	Any risk to the neighbourhood, the wider community or the environment through natural hazards or hazardous installations.	The AEE includes an assessment of the following effects: - Geotechnical Hazards (paragraphs 322-325 of the AEE, Appendix 5). - Flood Hazards (paragraphs 326-329, Appendix 31).	Y
Schedule 5 Clause 8(1) – Information required for subdivision consent			
	Description	Comment on information provided	Complete (Y / N / NA)
Sch 5 cl 8(1)	In addition to the information required under clause 5, a consent application for a subdivision must include information that adequately defines the following:		

Sch 5 cl 8(1)(a)	The position of all new boundaries.	A subdivision plan showing the locations of new boundaries is provided in Appendix 3 as Page 4, RC- PG110.	Y
Sch 5 cl 8(1)(b)	The areas of all new allotments, unless the subdivision involves a cross lease, company lease, or unit plan.	The areas of all new allotments are shown in the subdivision plan provided in Appendix 3 as Page 4, RC- PG110.	Y
Sch 5 cl 8(1)(c)	The locations and areas of new reserves to be created, including any esplanade reserves and esplanade strips.	The locations and areas of new reserves to be created are shown in the subdivision plan provided in Appendix 3 as Page 4, RC-PG110. No esplanade reserves or esplanade strips are proposed.	Y
Sch 5 cl 8(1)(d)	The locations and areas of existing esplanade reserves, esplanade strips, and access strips.	No existing esplanade reserves, esplanade strips, or access strips are located on or adjacent to the site.	N/A
Sch 5 cl 8(1)(e)	The locations and areas of any part of the bed of a river or lake to be vested in a territorial authority under section 237A of the Resource Management Act 1991.	No part of any bed of a river or lake is proposed to be vested in a territorial authority.	N/A

Sch 5 cl 8(1)(f)	The locations and areas of any land within the coastal marine area that is to become part of the common marine and coastal area under section 237A of the Resource Management Act 1991.	No land is located within the coastal marine area.	N/A
Sch 5 cl 8(1)(g)	The locations and areas of land to be set aside as new roads.	The locations and areas of land to be set aside as new roads is shown in the subdivision plan provided in Appendix 3 as Page 4, RC-PG110.	Y

Christchurch City Council response to clarification request from EPA – 8 April 2025

Act reference	Summary of CCC comments	EPA further questions	CCC response
<p>Sch 5 cl5(1)(d) and 5(6)</p> <p><i>‘the full name and address of—</i></p> <p><i>(i)</i></p> <p><i>each owner of the site and of land adjacent to the site; and</i></p> <p><i>(ii)</i></p> <p><i>each occupier of the site and of land adjacent to the site whom the applicant is unable to identify after reasonable inquiry; and’</i></p> <p>and</p> <p><i>‘If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the applicant must include a statement to that effect.’</i></p>	<p>The full name and address of all owners and occupiers of the application site are not stated. A Record of Title with the names of the registered owners has been provided. A list of owners and occupiers of neighbouring properties has been provided in Appendix 35. Properties where the applicant has not identified occupiers have been identified.</p>	<p>Would you mind clarify what information is missing?</p> <p>We have identified:</p> <ul style="list-style-type: none"> • the full names and addresses of adjacent landowners and occupiers where known) have been provided in Appendix 35; and • The names of the owners of the site (104 Ryans Road - Lot 4 DP 22679, 20 Grays Road - Part Lot 1 DP 2837, and Part Lot 3 DP 22679) are found in the Record of Title certificates (Appendix 2). 	<p>It not clear from the application whether there is an occupier of the application site. All other information has been provided.</p>
<p>Sch 5 cl5(1)(i)</p> <p><i>‘(i)</i></p> <p><i>identification of the relevant provisions in those Treaty settlements; and</i></p>	<p>Information about any Treaty settlements that apply in the area covered by the consent application has not been provided. This includes identification that</p>	<p>The Applicant has said that no Treaty Settlements apply to the area covered by the consent application on p.9, para. 2.10 of the Covering letter attachment. However, by searching on</p>	<p>It is noted that relevance of Treaty Settlements and resource consent processing is primarily in terms of Statutory Acknowledgement Areas.</p>

<p>(ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area; and'</p>	<p>provisions and redress are not applicable to the application</p>	<p>the Te Puni Kōkiri website and using resources provided to us by Te Arawhiti, we have reason to think that the Ngāi Tahu Claims Settlement Act is relevant to the area, including the Iwi's right of first refusal. Can you confirm whether the Ngāi Tahu Claims Settlement Act provides redress that affects the project site and if there are any other treaty settlements that should have been included to show compliance here. Please also see the hapu consultation documents (Appendix 29 and 30) which references the rangatiratanga of Ngāi Tahu.</p>	<p>Statutory Acknowledgement Areas within Christchurch District are identified in the Ngāi Tahu Claims Settlement Act, however the application site is not within or adjacent to a statutory acknowledgement area. We are unable to comment on other relevant provisions or redress under the Ngāi Tahu Claims Settlement Act or identify any other relevant Treaty settlements.</p>
<p>Sch 5 cl5(1)(k) 'the conditions that the applicant proposes for the resource consent; and'</p>	<p>Conditions 3, 4, 6, 8, 9, 10, 12, 13, 14, 15, and 16 proposed in relation to the land use consent sought under the Christchurch District Plan refer to plan provisions which are to be attached as appendices to the decision. The appendices have not been provided with the condition set.</p>	<p>We note that the proposed conditions refer to specific provisions of the District Plan yet to be provided but can be ascertained. Are you of the opinion that the provisions not being provided as appendices results in the cl being incomplete or insufficient? Would you agree that this matter is for the panel to consider?</p>	<p>It is acknowledged that the specified provisions can be ascertained by reference to the Christchurch District Plan. It is considered that this can be addressed during the panel process.</p>
<p>cl6(1)(d) of Sch 5</p>	<p>Mitigation measures are identified throughout the AEE and specialist</p>	<p>Acknowledge your comments. Do you consider that the merits and viability of</p>	<p>In terms of the identified mitigation, it is noted:</p>

<p><i>'a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity:'</i></p>	<p>reports, with mitigation proposed through design and required by conditions where relevant. However, a number of mitigation measures described are not able to be implemented, or are otherwise have not been provided with the application....</p>	<p>mitigation measures means that the Applicant has not adequately described the mitigation measures to be undertaken to help prevent or reduce the actual or potential effect of the activity? Or do you consider that this could be addressed by the panel?</p>	<ul style="list-style-type: none"> • In terms of proposed Consent Notices for land use conditions, there are likely to be a range of measures that would provide for a similar outcome that can be readily addressed through the panel process. • In relation to the shortfall in water supply it is noted that the shortfall is not assessed, and no mitigation is proposed. Accordingly, mitigation in this respect is not described and the application appears to be incomplete. However, given the shortfall is most well understood by Council infrastructure teams, it may be most efficient for this to be raised in substantive comments and addressed by the panel.
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			<ul style="list-style-type: none">• Construction Noise and Vibration Management Plan – while the plan has not been provided, and the condition set does not include this as a requirement, a condition requiring this be provided at a later stage is considered to be appropriate to mitigate effects. It is considered that this can be addressed during the panel process.• In relation to contaminated soil, while a remedial action plan has not been provided, and the condition set includes this as a requirement, which is considered to be appropriate to mitigate effects. It is considered that this can be addressed during the panel process.
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			<ul style="list-style-type: none"> In relation to mitigation of transport effects it is noted that the application relies on third parties to undertake mitigation measures, and does not identify alternative mitigation measures. However, it is considered that this can be addressed during the panel process.
<p>Cl7(a) of Sch 5 <i>'any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects.'</i></p>	<p>The AEE does not includes an assessment of the following effects:</p> <ul style="list-style-type: none"> The proposal will result in a shortfall in water supply capacity for other plan enabled development. 	<p>Similarly, does this mean that the AEE does not cover any effect on the people in the neighbourhood and the wider community? Or you think this is more suitable to be assessed for quality within panel considerations?</p>	<p>It is considered that the shortfall in water supply capacity for other plan enabled development represents an effect on the wider community that is not addressed in the AEE. As identified above, while an assessment has not been provided, this may be more efficiently dealt with through the panel process with the benefit of more substantial comments from Council infrastructure teams.</p>

<p>Cl7(b) of Sch 5 <i>'any physical effect on the locality, including landscape and visual effects.'</i></p>	<p>Transport Network Effects (paragraphs 188-203, Appendix 10).</p> <ol style="list-style-type: none"> 1. Within the Integrated Transport Assessment (ITA, Appendix 10) it is assumed that the speed limits along Ryans Road and Grays Road will be reduced from 80km/h to 50km/h or 60km/h and the proposal is assessed on this basis, however a change of speed limit is not sought in this application. The ITA should include an assessment based on the current speed limit. 2. Additionally, the following uncertainties in the trip generation information provided have been identified: <ul style="list-style-type: none"> • The proposal includes 126 lots ranging from 1,000m² to 4.7ha, with trip generation based on the TRICS database using UK trip data. This estimates a 	<p>Similarly, does this mean that the AEE does not cover physical effect on the locality, including landscape and visual effects? Or you think this is more suitable to be assessed for quality within panel considerations?</p>	<p>It is considered that the assessment of effects on the locality relating to transport included in both the AEE and Appendix 10, is incomplete noting the assumptions relating to the change of speed limit and lack of clarity in traffic modelling information. However, these matters may be more efficiently dealt with through the panel process alongside merits-based transport considerations.</p>
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	<p>two-way peak hour trip rate of 12.7-13.9 trips per hectare, resulting in a total of 8,804 trips per day, with 7-10% of those being heavy vehicle movements. It is not clear whether these trip rates have been validated and cross-referenced to ensure they are applicable to the New Zealand context.</p> <ul style="list-style-type: none"> • Given the significance of the proposed development and its impact on surrounding strategic transport infrastructure, a sensitivity test to assess the worst-case scenario effects would be expected. • The sources of the traffic count data used in the SIDRA base year models is unclear 		
<p>cl7(c) <i>'any effect on ecosystems, including effects on plants or</i></p>	<p>The AEE includes an assessment of the following effects:</p>	<p>We agree that the detailed baseline survey has not been provided yet, however the AEE outlines Ecology</p>	<p>It is noted that the detailed baseline survey is likely to give more certainty as to the level of</p>

<p><i>animals and physical disturbance of habitats in the vicinity:</i></p>	<p>-Herpetology (paragraphs 274-279, Appendix 7). Note that a detailed baseline survey for the presence of herpetofauna has not been provided.</p> <p>- Freshwater (paragraphs 280-85, Appendix 8).</p> <p>- Avifauna (paragraphs 286-288, Appendix 9).</p>	<p>and Biodiversity Effects (Herpetology, Freshwater, and Avifauna) on pp. 66–68. Paras. 274-279 of the AEE relate specifically to herpetology, to which the Lizard Management Plan (Appendix 7) is referenced. A field survey, as described on p. 20 of Appendix 7, states that although no presence of lizards were sighted, the habitat suggests that it could be likely. It also identified the Canterbury spotted skinks, jewelled geckos, southern grass skinks and Waitaha geckos being of importance due to their 'at risk' or 'threatened' status (these species have been identified through a desktop survey as described at 2.1 of Appendix 7). Actual and potential effects on lizards and methodology to avoid, remedy and mitigate effects are outlined on pp. 21-26. Do you think the information provided is not sufficient to satisfy the requirements of this clause?</p>	<p>effect generated by the activity. However, the investigations provided with the application and conditions volunteered by the applicant, including the Lizard Management Plan, accord with the approach of the Christchurch City Council in processing applications for resource consent. Taking into account s44, the information provided is considered sufficient to satisfy the requirements of the clause.</p>
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2. Consultation with the Department of Conservation as the administering agency for the following Acts

- Wildlife approval (as defined in clause 1 of Schedule 7 of the Act) (section 42(4)(h) of the Act)

Response from Department of Conservation (DoC)

1.0 Request Overview

Project name	Ryans Roads Industrial Development
Project applicant	Carter Group Limited
EPA File ref. no	FTAA-2502-1021
Conservation approvals sought	Wildlife approval (as defined in clause 1 of Schedule 7 of the Act) (section 42(4)(h) of the Act)
EPA request summary	To inform the EPA's completeness assessment of the application, could you please let us know, in your view, whether the documentation provided by the EPA regarding the above approvals as provided by the applicant meet the requirements of sections 42 and 43 of the Act and is provided in 2 sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act
Date due to EPA	1.04.2025

2.0 Fast-track application completeness check summary

The Department of Conservation (DOC) has received a request from the EPA to review documentation provided in the application for Ryans Road Industrial Development (the project) and advise whether in DOC's view it:

- meets the requirements of sections 42 and 43 of the Fast-track Approvals Act 2024 (FTAA) and
- is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the FTAA.

Below are key messages and observations, followed by DOC's commentary and the supporting tables. Observations have been provided on the limitations of the assessments and/or provide context to the EPA as decision maker under section 46. Please let us know if DOC can help your consideration further.

Key Messages

Wildlife lizard baseline surveys have not been undertaken by the applicant. The applicant has identified ways to address the insufficiency. DOC's opinion is if the proposed surveys are adequately carried out and if the Lizard Management Plan (LMP) is updated accordingly, this could fill the information gaps. DOC acknowledges the expert panel is able to request further information during the process.

Observations

DOC has focused its feedback on the information in Appendix 07 – Lizard Habitat Assessment and Lizard Management Plan (PDP) and relevant parts of the Assessment of Effects.

Commentary on Wildlife Approval

Information required for a wildlife approval

DOC has determined that the information required for the relevant wildlife application is

insufficient to satisfy all elements of Schedule 7 of the FTAA because:

- The applicant has not undertaken adequate baseline surveys to identify specific wildlife Lizard species present on site. This means:
 - it is not possible to identify potential impacts on specific species (should they be present) and actual/potential effects of the activity
 - the methods proposed to salvage and relocate lizards cannot be assessed as they are not informed by survey data. The methods identified are not appropriate for all the potential species that could be present e.g. Canterbury spotted skink (nationally critically endangered species).
 - the Lizard Management Plan (LMP) is speculative around mitigations and avoidance strategies e.g. there is a reliance on confirming mitigation methods in future, such as identifying appropriate relocation sites based. There are constraints to relocation of lizards in this area

Section 29 – listed project consultation requirements

Section 29(1)(a) requires that, before lodging an application for a **listed project**, the authorised person for the project must consult the persons and groups referred to in section 11. DOC is included in this per section 11(1)(e) as we are a relevant administering agency.

Date	Nature of consultation
20/02/2025	<p>The applicant engaged with DOC prior to lodgement of the substantive application.</p> <p>It is noted that DOC advised further surveys should be undertaken to inform the LMP. The applicant has addressed this feedback by setting up surveys concurrent with lodging the application. A 'living' LMP has been provided with the application. The LMP is not informed by survey data, which would be a standard expectation to inform management strategies that are dependent on species and numbers of lizards present. DOC also advised that the applicant should identify if:</p> <ul style="list-style-type: none"> Any other species requiring a Wildlife Approval are present / or if a freshwater fisheries approval is required. It appears the applicant has not lodged an application for any other approval as such and in accordance with the EPA 's request DOC has not considered these aspects as part of its approval.

Applications for wildlife approvals

Clause 2 of Schedule 7 outlines the information required in an application for a wildlife approval.

Relevant section	Page reference in application	Information Provided	Does DOC consider sufficient	Commentary
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Schedule 7 clause 2(1) For the purposes of section 43(3)(h) , an application for a wildlife approval must—				
(a) specify the purpose of the proposed activity:	Identified throughout AEE and Appendix 7 (including pg 22)	Yes	Yes	
(b) identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land):	Appendix 7 - pg 19	Yes	Yes	
(c) include an assessment of the activity and its impacts against the purpose of the Wildlife Act 1953 :	Appendix 7 – pg 18	Yes	Yes	
(d) list protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted:	Appendix 7 – pg 20,21 AEE para. 274-289			A desktop study has been provided but it does not reflect an accurate list of species likely to be present based on habitat (nor is it informed by detailed surveys, which DOC advised should be undertaken to inform an LMP). For example - the desktop assessment includes reference to northern grass skink; these are only found in northern South

	Appendix 9			Island and North Island and therefore would be highly unlikely to be present on this site.
(e) outline impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System):	Appendix 7 – pg 3	Yes	No	<ul style="list-style-type: none"> • Impacts outlined are habitat removal and mortality. • The impacts on these species do not take in to account the associated threat status • The impacts are not sufficiently identified as survey data has not informed the species present, nor the population size.
(f) state how the methods proposed to be used to conduct the actions specified under paragraph (b) will ensure that best practice standards are met:	Appendix 7 – pg 21-35	Yes	No	<ul style="list-style-type: none"> • The applicant has provided a ‘living’ Lizard Management Plan to address how lizards will be salvaged and relocated however, the LMP does not identify the release location nor sufficient methods for avoidance of adverse effects or relocation. • The scale and intensity of a salvage operation (and subsequently methods used) should be catered to species and scale (numbers) – which would be informed by a detailed survey, a detailed survey has not been undertaken.

				<ul style="list-style-type: none"> • The methods proposed could be considered sufficient in relation to southern grass skinks. However, DOC would consider them insufficient if the Canterbury Spotted Skink – (Nationally Critical species) were identified on site as this would warrant alternative methods for salvage and relocation (e.g. greater protection at relocation sites/and consideration of avoidance methods). • The applicant has not identified potential relocation sites. It would be best practice to identify relocation sites so that they can be assessed and prepared appropriately as part of providing a wildlife approval. Translocation of salvaged lizards does not guarantee their survival. Identifying a release location early in the project and then preparing the site to maximise the survival and success is necessary. The monitoring proposed is speculative based on the potential numbers of lizards identified on
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				site. Ideally surveys would inform a management plan prior to lodgement so that these actions are not speculative.
(g) describe the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	Appendix 7 pgs 22 - 26	Yes	No	<ul style="list-style-type: none"> As above methods viewed as insufficient which subsequently means insufficient description. Tools such as pitfall traps, ACO, Gee minnow are cited and proposed to be used in the way intended, but duration and intensity or location is not adequately defined therefore DOC is unable to assess the effectiveness of the proposed methods.
(h) state the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available):		Yes	No	<ul style="list-style-type: none"> The salvage location is clear in the broad sense, but the specific locations have not been identified. As above the release locations for any potential salvaged lizards have not been identified.
(i) state whether authorisation is sought to temporarily hold or relocate wildlife:		Yes	Yes	
(j) list all actual and potential wildlife effects (adverse or positive) of the	Appendix 7 –	No	No	<ul style="list-style-type: none"> Effects are identified at a high level.

<p>proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site:</p>	<p>pgs 21- 22</p>			<ul style="list-style-type: none"> • DOC would anticipate that effects would be informed by surveys detailing species present on the site. As detailed surveys have not been provided as part of the application it is unlikely all effects are identified • The documents/reports do not acknowledge residual effects given the methods i.e. salvaging, mowing, the salvaging and relocating is only likely to protect a small portion of the population(s) present.
<p>(k) where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife):</p>	<p>Appendix 7 pg 21-26</p>	<p>Yes</p>	<p>No</p>	<ul style="list-style-type: none"> • It is acknowledged that the relocation set out in this report seeks to minimise effects on lizards. • More detailed surveys have not been undertaken prior to the lodgement of the application to inform a sufficient assessment of actual and potential adverse effects and subsequently the methods provided do not relate to any detailed effects. • Other than salvage there are no additional avoid/minimisation or compensation activities proposed.

(l) state whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act 1953 :	Appendix 7 – pg 4	Yes	Yes	
(m) state whether the applicant or any company director, trustee, partner, or anyone else involved with the application has any current criminal charges under the Wildlife Act 1953 pending before a court:	Appendix 7 – pg 4	Yes	Yes	
(n) provide proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts:		N/A	N/A	To be determined by the EPA
(o) provide any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal.	Appendix 7	Yes	Yes	

Completeness check against section 43

Note that it is primarily for the EPA to run completeness checks for these criteria. However, DOC can include this section in advice back to the EPA if we are concerned that something from these information requirements is missing or deficient.

Rows with highlighted guidance are likely the only elements DOC should be looking at. Remainder of the requirements is included just in case.

Requirement	Page reference in application	Commentary
Section 43(1) - A substantive application		
(a) Must be lodged in the form and manner approved by the EPA; and		
(b) Must—		
(i) explain how the project to which the application relates is consistent with the purpose of this Act; or		
(ii) for a project referred under section 21(1)(a)—		
(A) explain how both the stage to which the application relates and the whole project are consistent with the purpose of this Act		
(B) contain information relating to the likelihood that any later stages of the project will be completed;		
(c) must demonstrate that the project does not involve any ineligible activities		
(d) must, if the application is lodged by more than 1 authorised person, state the proposed approval to be held by each person; and		
(e) must comply with—		
(i) any information requirements specified by the Minister under section 27(3)(b)(ii) ; and		EPA to confirm

(ii) the requirements listed in subsection (3) that apply to the approvals sought; and	<i>Note that these are dealt with at the end of this table</i>	
(f) must, if the authorised person has applied under section 39 for a determination under section 23 or 24 , include a copy of the notice under section 39(4) ; and		EPA to confirm
(g) must, if the application seeks an approval for an activity that is the subject of a determination under section 23 , set out the steps taken to secure the agreement referred to in section 5(1)(a) ; and		EPA to confirm
(h) must state whether the application relates to a priority project and, if so, include confirmation that, to the best of the applicant's knowledge, there are no competing applications; and		EPA to confirm
(i) must be made by the deadline specified in the notice under section 28(3)(d) ; and		EPA to confirm
(j) must not lodge a substantive application unless any fee, charge, or levy payable under regulations in respect of the application is paid.		EPA to confirm
<p>43(2) If a substantive application is for a listed project, it must also contain the information required by section 13(4) (other than section 13(4)(b), (f)(ii) and (iii), and (g)), which applies—</p> <p>(a) as if the reference in section 13(4)(k) to section 11 were a reference to section 29; and</p> <p>(b) as if the reference in clause 2 of Schedule 11 to section 12(2) were a reference to section 29; and</p> <p>(c) with any other necessary modifications.</p>		
(a) a description of the project and the activities it involves:		EPA to confirm

<p>(b) information to demonstrate that the project does not involve any ineligible activities (other than activities that may be the subject of a determination under section 23 or 24):</p>		EPA to confirm
<p>(c) a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application:</p>		EPA to confirm
<p>(e) the anticipated commencement and completion dates for construction activities (where relevant):</p>		EPA to confirm
<p>(f) a statement of whether the project is planned to proceed in stages and, if so, an outline of the nature and timing of the stages</p>		EPA to confirm
<p>(h) a description of the anticipated and known adverse effects of the project on the environment:</p>		See comments on assessment of effects in relation to Wildlife Approval in above table.
<p>(i) a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991:</p>		EPA to confirm
<p>(j) a list of the persons and groups the applicant considers are likely to be affected by the project, including—</p> <ul style="list-style-type: none"> i) relevant local authorities: ii) iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements: iii) other relevant iwi authorities: iv) relevant Treaty settlement entities: v) relevant protected customary rights groups and customary marine title groups: 		EPA to confirm

vi)	ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou:		
vii)	relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011:		
viii)	persons with a registered interest in land that may need to be acquired under the Public Works Act 1981:		
(k) a summary of—			
(i)	the consultation undertaken for the purposes of section 11 and any other consultation undertaken on the project with the persons and groups referred to in paragraph (j); and		EPA to confirm
(ii)	how the consultation has informed the project:		As set out in DOC's Section 29 commentary.
(l)	a list of any Treaty settlements that apply to the project area, and a summary of the relevant principles and provisions in those settlements:		EPA to confirm
(m)	a description of any processes already undertaken under the Public Works Act 1981 in relation to the project:		EPA to confirm
(n)	a statement of any relevant principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019:		EPA to confirm
(o)	information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area:		EPA to confirm
(p)	a statement of whether the applicant is seeking a determination under section 23 and, if so, an assessment of the effects of the activity on the relevant land and on the rights and interests of Māori in that land:		EPA to confirm

a statement of whether the applicant is seeking a determination under section 24(2) and, if so, a description of—		
(i) the scale and adverse effects of the existing electricity infrastructure; and		N/A
(ii) how, if at all, that scale or those adverse effects are anticipated or known to change as a result of the maintenance, upgrading, or continued operation of the infrastructure:		N/A
(q) a statement of whether the applicant is seeking a determination under section 24(4) and, if so,—		N/A
(i) a description of every alternative site considered by the applicant (or, if the referral application is lodged by more than 1 person, any of those persons) for the construction and operation of the new electricity lines (the activity); and		N/A
(ii) for each alternative site considered,— A) a statement of the anticipated and known financial cost of undertaking the activity; and B) a description of the anticipated and known adverse effects of undertaking the activity; and C) a description of the anticipated and known financial cost and practicality of available measures to avoid, remedy, mitigate, offset, or compensate for the anticipated and known adverse effects of the activity; and D) a description of any issues (including financial cost) that would make it impractical to undertake the activity on the site; and E) an assessment of whether it would be reasonable and practical to undertake the activity on the site, taking into account the matters		N/A

referred to in subsubparagraphs (A) to (D) and any other relevant matters:		
(r) a description of the applicant's legal interest (if any), or if the referral application is lodged by more than 1 person, the legal interest of any of those persons (if any), in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work:		EPA to confirm
(s) an outline of the types of consents, certificates, designations, concessions, and other legal authorisations (other than contractual authorisations or the proposed approvals) that the applicant considers are needed to authorise the project, including any that the applicant considers may be needed by someone other than the applicant:		DOC notes that if any other protected wildlife is found during future project development, then Wildlife Approvals will likely be required. It is anticipated in this event they would be processed via BAU, as they have not been applied for and cannot be lawfully issued speculatively.
(t) whether any activities that are involved in the project, or are substantially the same as those involved in the project, have been the subject of an application or a decision under a specified Act and,— (i) if an application has been made, details of the application: (ii) if a decision has been made, the outcome of the decision and the reasons for it:		No previous Wildlife Approval in this location/for this activity identified.
(u) a description of whether and how the project would be affected by climate change and natural hazards:		EPA to confirm
(v) if the referral application is lodged by more than 1 person, a statement of each proposed approval to be held by each of those persons:		EPA to confirm

(w) a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant (or if the referral application is lodged by more than 1 person, any of those persons) under a specified Act:		DOC has not identified any compliance issues in relation to the applicant and DOC approvals.
43(3) The requirements referred to in subsection (1)(e)(ii) are those set out in,—		
(a) for an approval described in section 42(4)(a) (resource consent), clauses 5 to 8 of Schedule 5:	EPA to confirm	
(b) for an approval described in section 42(4)(b) (change or cancellation of resource consent condition), clause 10 of Schedule 5:	EPA to confirm	
(c) for an approval described in section 42(4)(c) (certificate of compliance), clause 11 of Schedule 5:	N/A EPA to confirm	
(d) for an approval described in section 42(4)(d) (designation), clause 12 of Schedule 5:		
(e) for an approval described in section 42(4)(e) (concession), clause 3 of Schedule 6:	N/A EPA to confirm	
(f) for an approval described in section 42(4)(f) (land exchange), clause 27 of Schedule 6:	N/A EPA to confirm	
(g) for an approval described in section 42(4)(g) (conservation covenant), clause 42 of Schedule 6:	N/A EPA to confirm	
(h) for an approval described in section 42(4)(h) (wildlife approval), clause 2 of Schedule 7:	See Table	
(i) for an approval described in section 42(4)(i) (archaeological authority), clause 2 of Schedule 8:	N/A EPA to confirm	

(j) for an approval described in section 42(4)(j) (complex freshwater fisheries activity approval), clause 3 of Schedule 9:	DOC notes the applicant has not applied for a Freshwater Fisheries Approval.
(k) for an approval described in section 42(4)(k) (marine consent), clauses 3 and 4 of Schedule 10:	N/A EPA to confirm
(l) for an approval described in section 42(4)(l) or (m) (access arrangement), clause 3 of Schedule 11:	N/A EPA to confirm
(m) for an approval described in section 42(4)(n) (mining permit), clause 16 of Schedule 11.	N/A EPA to confirm
Schedule 5 clause 9 - For the purposes of section 43(3)(a), a consent application for a project that includes a standard freshwater fisheries activity must include the information set out in clause 3 of Schedule 9	N/A

File ref: FTAA-2502-1054

28 April 2025

Ministry for the Environment

C/- Fast-track team

By email: adminagencyFTAA@mfe.govt.nz: [REDACTED]

Tēnā koe

Consultation regarding a substantive application under the Fast-track Approvals Act 2024

Carter Group Limited has lodged a substantive application under the Fast-track Approvals Act 2024 (the Act). The Ryans Road Industrial Development application relates to a 55-hectare industrial subdivision at 104 Ryans Road, creating 126 freehold industrial lots, with infrastructure such as roads, three-waters utilities, and landscaping.

The substantive application includes applications for the following approvals under the Resource Management Act 1991 (RMA) that the Ministry for the Environment is the relevant administering agency for:

- a resource consent that would otherwise be applied for under the RMA (section 42(4)(a) of the Act)

The EPA must decide whether a substantive application complies with section 46 of the Act, being the completeness and scope assessment prior to referral of a substantive application to an Expert Panel. As part of making its decision, the EPA now consults with the Ministry for the Environment as the relevant administering agency for the RMA approval(s) sought. Note that the EPA also consults directly with the relevant consent authorities.

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Consultation

To inform the EPA's completeness assessment of the application, could you please let us know, in your view, whether the **attached via the portal** documentation regarding the RMA approvals as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

Summary of changes to new lodgement

Amendments to the AEE:

- 11.1 Paragraph [373] and Table 4 (Consultation Summary) 1 has been amended to provide a summary of the consultation with MfE and an explanation of how it informed the project.
- 11.2 Paragraphs [105] to [106], [115], [274] to [278] and [292], Table 2 (Assessment of Mana Whenua recommendations) 2 and Table 4 (Consultation Summary) 3 have been amended to refer to the Survey Report.

Additional appendices:

- Appendix 24 (Consultation Documents & Records) now includes the record of consultation with MfE (i.e. the MfE Feedback).
- Appendix 38 (Lizard Surveys) has been added to attach the Survey Report to the Amended Application.

Please provide your response by 5 May 2025.

The EPA must decide on completeness of the substantive application by 15 May 2025. As such, if we do not hear back from you by 5 May 2025, we are unable to consider your response.

If you cannot respond by that deadline, please contact **s 9(2)(g)(ii)** as soon as possible upon receipt of this letter to discuss a timeframe for response that may be workable.

If you have any questions, please contact **s 9(2)(g)(ii)** Project Leader by email at info@fasttrack.govt.nz.

Nāku noa, nā

s 9(2)(g)(ii)

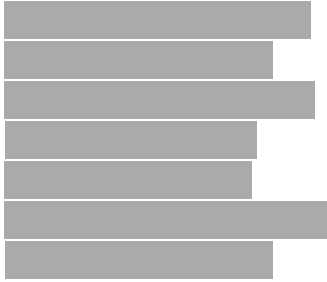
s 9(2)(g)(ii)

Senior Advisor, Fast-track Applications

FTAA-2504-1054

28 April 2025

Director General of Conservation
C/- Department of Conservation Fast-track team
By Email: Fast-track@doc.govt.nz



Tēnā koe

Consultation regarding a substantive list application under the Fast-track Approvals Act 2024

Carter Group Limited has lodged a substantive application under the Fast-track Approvals Act 2024 (the Act). The Ryans Road Industrial Development application relates to a 55-hectare industrial subdivision at 104 Ryans Road, creating 126 freehold industrial lots, with infrastructure such as roads, three-waters utilities, and landscaping.

The substantive application includes applications for the following approvals that the Department of Conservation (DOC) is the administering agency for under the following Acts:

- Wildlife approval (as defined in clause 1 of Schedule 7 of the Act) (section 42(4)(h) of the Act)

The EPA must decide whether a substantive application complies with section 46 of the Act, being the completeness and scope assessment prior to referral of a substantive application to an Expert Panel. As part of making its decision, the EPA must consult with DOC as the relevant administering agency for the above listed approval(s) sought.

Consultation

To inform the EPA's completeness assessment of the application, could you please let us know, in your view, whether the documentation provided by the EPA regarding the above approvals as

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provided by the applicant meet the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

Summary of changes to new lodgement

Amendments to the AEE:

- 11.1 Paragraph [373] and Table 4 (Consultation Summary) 1 has been amended to provide a summary of the consultation with MfE and an explanation of how it informed the project.
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Additional appendices:

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Please provide your response by 5 May 2025.

The EPA must decide on completeness of the substantive application by 15 May 2025. As such, if we do not hear back from you by 5 May 2025, we are unable to consider your response.

If you cannot respond by that deadline, please contact s 9(2)(g)(ii) as soon as possible upon receipt of this letter to discuss a timeframe for response that may be workable.

If you have any questions, please contact s 9(2)(g)(ii) Project Leader by email at info@fasttrack.govt.nz.

Nāku noa, nā

s 9(2)(g)(ii)

s 9(2)(g)(ii)

Senior Advisor, Fast-track Applications

FTAA-2504-1054

28 April 2025

Stefanie Rixecker
Chief Executive
Environment Canterbury Regional Council
C/- [REDACTED]
By Email: fasttrack@ecan.govt.nz
[REDACTED]

Tēnā koe

Consultation regarding a substantive application under the Fast-track Approvals Act 2024

Carter Group Limited has lodged a substantive application under the Fast-track Approvals Act 2024 (the Act). The Ryans Road Industrial Development application relates to a 55-hectare industrial subdivision at 104 Ryans Road, creating 126 freehold industrial lots, with infrastructure such as roads, three-waters utilities, and landscaping.

The substantive application includes applications for the following approvals under the Resource Management Act 1991 (RMA) that Environment Canterbury Regional Council is the relevant consent authority for:

- a resource consent that would otherwise be applied for under the RMA (section 42(4)(a) of the Act)

The EPA must decide whether a substantive application complies with section 46 of the Act, being the completeness and scope assessment prior to referral of a substantive application to an Expert Panel. As part of making its decision, the EPA must consult with Environment Canterbury Regional Council as the relevant consent authority for the RMA approval(s) sought.

Consultation

To inform the EPA's completeness assessment of the application, could you please let us know, in your view, whether the **attached** documentation regarding the RMA approvals as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

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Specific questions relating to this application in accordance with section 30 of the Act

1. Confirm that the written notice prepared by Council remains accurate and final at the time of receiving this letter.

Summary of changes to new lodgement

Amendments to the AEE:

- 11.1 Paragraph [373] and Table 4 (Consultation Summary) 1 has been amended to provide a summary of the consultation with MfE and an explanation of how it informed the project.
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If you cannot respond by that deadline, please contact s 9(2)(g)(ii) as soon as possible upon receipt of this letter to discuss a timeframe for response that may be workable.

If you have any questions, please contact s 9(2)(g)(ii) Project Leader by email at info@fasttrack.govt.nz.

Nāku noa, nā

s 9(2)(g)(ii)

s 9(2)(g)(ii)

Senior Advisor, Fast-track Applications

FTAA-2504-1054

28 April 2025

Mary Richardson
Chief Executive
Christchurch City Council
C/- [REDACTED]
By Email: fasttrackresourceconsents@ccc.govt.nz
[REDACTED]

Tēnā koe

Consultation regarding a substantive application under the Fast-track Approvals Act 2024

Carter Group Limited has lodged a substantive application under the Fast-track Approvals Act 2024 (the Act). The Ryans Road Industrial Development application relates to a 55-hectare industrial subdivision at 104 Ryans Road, creating 126 freehold industrial lots, with infrastructure such as roads, three-waters utilities, and landscaping.

The substantive application includes applications for the following approvals under the Resource Management Act 1991 (RMA) that the Christchurch City Council is the relevant consent authority for:

- a resource consent that would otherwise be applied for under the RMA (section 42(4)(a) of the Act)

The EPA must decide whether a substantive application complies with section 46 of the Act, being the completeness and scope assessment prior to referral of a substantive application to an Expert Panel. As part of making its decision, the EPA must consult with Christchurch City Council as the relevant consent authority for the RMA approval(s) sought.

Consultation

To inform the EPA's completeness assessment of the application, could you please let us know, in your view, whether the **attached** documentation regarding the RMA approvals as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

fasttrack.govt.nz | info@fasttrack.govt.nz | 0800 FASTRK

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1. Confirm that the written notice prepared by Council remains accurate and final at the time of receiving this letter.

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Additional appendices:

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- Appendix 38 (Lizard Surveys) has been added to attach the Survey Report to the Amended Application.

Please provide your response by 5 May 2025.

The EPA must decide on completeness of the substantive application by 15 May 2025. As such, if we do not hear back from you by 5 May 2025, we are unable to consider your response.

If you cannot respond by that deadline, please contact s 9(2)(g)(ii) as soon as possible upon receipt of this letter to discuss a timeframe for response that may be workable.

If you have any questions, please contact s 9(2)(g)(ii), Project Leader by email at info@fasttrack.govt.nz.

Nāku noa, nā

s 9(2)(g)(ii)

s 9(2)(g)(ii)

Senior Advisor, Fast-track Applications

Memorandum on Completeness and Scope

File	FTA-2504-1054
Application	Ryans Road Industrial Development
To	Manager LOA/ Team Leader LOA
From	s 9(2)(g)(ii), Application Lead (Contractor)
Date	13 May 2025
Subject	Assessment whether the application complies with section 46(2) of the Fast-track Approvals Act 2024

Purpose

1. The purpose of this memo is to assist you in making your decision on whether the Ryans Road Industrial Development application, received by the Fast-track Team on 23 April 2025, lodged by Carter Group Limited complies with the requirements of section 46(2) of the Fast-track Approvals Act 2024 (**the Act**).
2. Of relevance is that an application for the Ryans Road Industrial development was previously made to the EPA in March 2025. This application was ultimately determined to be incomplete by the EPA because “*The application lacks a summary or evidence of consultation with the Ministry for the Environment (MfE) as the relevant administering agency of the Resource Management Act 1991 (RMA) under which approvals are sought.*”
3. The current version of the application contains several minor amendments compared to the previous version. For the purposes of this memo, the March 2025 version of the application will be referred to as the “previous application”, and the April 2025 application, which is the subject of this memorandum, will be referred to as the “application” or the “current application”.

Decision-maker

4. You have delegated authority to make the decision under section 46 of the Act under the instrument of delegation dated 5 February 2025.

Conflict of interest

5. I confirm that I do not have any conflict of interest in this matter that would prevent me making this assessment.

The application

6. For projects listed in Schedule 2 of the Act and referred projects, authorised persons may lodge a substantive application for approvals available under the Act.
7. The Ryans Road industrial Development is a listed project.
8. The EPA received the substantive application for Ryans Road Industrial Development on 23 April 2025 by Carter Group Limited. The EPA must, in consultation with the relevant administering agencies and relevant consent authorities, decide whether this substantive application complies with section 46 of the Act by 15 May 2025.
9. As set out in more detail below, the EPA must decide whether the application is complete and either:
 - provide the application to the Panel Convener for consideration and decision by the expert consenting panel (if complete and within scope); or
 - return it to the person who lodged it (if incomplete and not within scope).

Project

10. The Ryans Road Industrial Development application relates to a 55-hectare industrial subdivision at 104 Ryans Road, Christchurch, creating 126 freehold industrial lots, with infrastructure such as roads, three-waters utilities, and landscaping. The application description is within scope with the listed project in Schedule 2 of the Act, to '*Subdivide and develop land for industrial use at 55.5 hectares*' at '104 Ryans Road, Harewood, Christchurch'

Fast-track consenting application process

Legislative context

11. The EPA must decide whether the substantive application complies with section 46(2) of the Act. A substantive application complies with section 46(2) of the Act, if the application:
 - complies with sections 42, 43 and 44;
 - relates solely to a listed project or a referred project;
 - the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and
 - any fee, charge, or levy payable under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations) in respect of the application is paid.

Section 42 Requirements

12. Section 42 of the Act states that an authorised person may lodge a substantive application for one project or substantive applications for each stage of a project. Section 42(4) lists the approvals that may be sought under the Act.
13. The Applicant is seeking approvals under Section 42(4)(a) of the Act and Section 42(a)(h) of the Act, being an approval that would otherwise be applied for under the Resource Management Act 1991 and a Wildlife approval.

Section 43 Requirements

14. Section 43 of the Act sets out the requirements for a substantive application. A substantive application must be lodged in the form and manner approved by the EPA and must include the information listed in this section.
15. An assessment of the Section 43 requirements has been undertaken, and I consider that all required information has been provided. A full assessment of the information requirements for the application, which cross-references the relevant schedules and clauses of the Act, is included at **Appendix 1** to this memorandum.

Section 44 Requirements

16. Section 44 of the Act requires that the information provided by the applicant under Section 43 must be specified in sufficient detail to satisfy the purpose for which it is required.
17. An assessment of the Section 44 requirements has been undertaken, and I consider that all of the information required by Section 43 has been provided in sufficient detail to enable a comprehensive assessment of the application to proceed.
18. In assessing this sufficiency of the Application, consideration has been given to the comments provided by each relevant administering agency, in this instance being Environment Canterbury (Canterbury Regional Council), Christchurch City Council, the Department of Conservation (DoC) and the Ministry for Environment. The comments of these agencies are summarised in Paragraphs 25 - 34 below.
19. As detailed above, a full assessment of the information requirements for the application, which considers the sufficiency of detail, is included at **Appendix 1** to this memorandum.

Ineligibility

20. The EPA needs to decide whether it considers that, on the face of the application, the project involves an ineligible activity, as defined in section 5 of the Act. As the EPA has to consider this on the face of the application, the EPA is only able to consider information contained in the application materials.
21. The list of ineligible projects includes activities:

- on land returned under a Treaty settlement, on identified Māori Land, on Māori customary land, on land set apart as Māori reservation, or in a customary marine title or protected customary rights area without written permission from the rights holder;
 - on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993;
 - in a customary marine or protected customary rights area without written agreement from the rights holder/group;
 - within an aquaculture settlement area without the required authorisation;
 - activities that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA (which deal with occupation of space in the common marine and coastal area); or
 - that require permissions on national reserves held under the Reserves Act 1977 ; or
 - on land listed under clauses 1 to 11 or 14 of Schedule 4 of the Crown Minerals Act 1991 (and clauses 12 and 13 for mining activities).
22. Following a review of the application, based on information contained in the lodged application documents as outlined in Checklist J, it does not appear to involve an ineligible activity.

Fees and levies

23. The EPA has received all fees and charges and levies payable by the Applicant under the Regulations for the substantive application as follows:
- Application fee in the sum of \$250,000 plus GST; and
 - Levy in the sum of \$140,000 plus GST.

Consultation

24. A summary of comments provided by the relevant administering agencies and relevant local authorities in response to consultation for an approval that would otherwise be applied for as either a resource consent application (Section 42(4)(a) of the Act) or a wildlife approval (Section 42(4)(h) of the Act) is included below. It is noted that the Ministry for Environment did not provide a response.
25. The full written comments of each agency are provided as **Appendix 2** to this memorandum.

Environment Canterbury (Canterbury Regional Council)

26. Environment Canterbury provided a brief response confirming that its previous letter to the EPA dated 31 March 2025, remained accurate. Overall, while Environment Canterbury considers that the rules assessment provided in the application (relevant to Schedule 5, Clause 5(2)(f) of the Act) needs to be updated to identify the correct reasons for consent under the Land and Water Regional Plan, the overall activity status identified is correct. No other concerns regarding application completeness were identified.

Christchurch City Council (CCC)

27. CCC provided a brief response confirming that it has reviewed the differences between the previous and current applications, and in so far as these changes are concerned, CCC has no concerns that the amended information is incomplete. However, CCC referred back to its previous correspondence to the EPA in April 2025, noting that these comments remained accurate. The key matters addressed in that letter, in relation to application completeness, are as follows:
- There are some anomalies in the conditions recommended, including references to some appendices which are not provided in full and the omission of conditions relating to a Construction, Noise and Vibration Management Plan which is mentioned in the assessment of environmental effects. These anomalies are relevant to the information requirements of Schedule 5, clauses 5(1)(k), 5(5)(a) and 6(1)(d) in relation to mitigation.
 - Concerns regarding a lack of assessment and identified mitigation measures (as required by Schedule 5, Clause 6(1)(d), in relation to the development creating a shortfall for future water supply capacity to support growth of land zoned for development elsewhere under the current District Plan, as outlined to the applicant during consultation and specified in the 'Ryans Road Industrial Park – Development: Water Supply Modelling Assessment' attached as Appendix D to Appendix 12 of the application.
 - Concerns regarding a lack of assessment and identified mitigation measures (as required by Schedule 5, Clause 6(1)(d), in relation to over-capacity issues at the intersection of Ryans Road and Pound Road.
 - Lack of written approval from Christchurch International Airport, given that a portion of the site proposed to be subdivided is within designation D1 – Christchurch International Airport and written approval from the requiring authority, Christchurch International Airport Limited, has not been provided.
28. CCC have raised concerns in relation to anomalies in the proposed conditions and adequacy of mitigation measures for water supply and roading capacity issues. However, it is noted that CCC will have an opportunity to provide written comments on the application again under Section 53 of the Act, where it is anticipated that relevant local authorities will provide more detailed technical comments to inform the panel's assessment of the proposal, and the panel's decision on whether additional information is required from the Applicant. In relation to these matters, as outlined in the checklists below, I am satisfied that the information required by the Act has been specified in sufficient detail to satisfy the purpose for which it is required, pursuant to Section 44 of the Act.
29. It is further noted that the written approval of the Christchurch Airport, as the requiring authority for the designation which affects part of the site, is not information that is required under Section 43 of the Act.

The Department of Conservation

30. The DoC commented that the application is in accordance with the information requirements of the Act, except for Schedule 7, Clause 2(1)(b) and (h) of the Act, which requires an application for a wildlife approval to identify the actions the Applicant wishes to carry out involving protected wildlife and *where* these actions will be carried out.
31. The DoC has noted that the release locations for the potential lizard relocation activity have not been identified. However, it is further noted that:
 - DoC expects that panel will require this information to be provided during its consideration of the Wildlife approval;
 - Now that lizards have been confirmed on the project site, updating the Lizard Management Plan (LMP) to specify the relocation sites would address the insufficiency of information and this could be done as part of the process for a Wildlife Approval; and
32. Finding and establishing relocation sites can be a time-consuming process but would be a fundamental part of giving effects to an LMP. From a practical perspective e.g. given the potential permissions involved (relocation site owners to agree) and timeframes involved to prepare habitat, best practice is to identify relocation sites prior to the provision of an approval.
33. Having considered the advice of DoC, and on review of the LMP provided as part of Appendix 7 to the Application, I am satisfied that the information required as part of the application has been specified in sufficient detail to satisfy the purpose for which it is required, pursuant to Section 44 of the Act.
34. Whilst the relocation sites for lizards have not been identified, the LMP does outline the likely locations of lizard habitats on the site, where the active management of effects will need to occur, along with a methodology for identifying/surveying sites, and protocol for relocation sites. DoC has acknowledged that finding and establishing relocation sites can be time consuming, and that in order to achieve best practise, the panel may request confirmation of relocation sites prior to issuing an approval. It is therefore accepted that this is only undertaken if necessary and is information that can be provided at a later stage.

Assessment of compliance for each section of each application form

35. I have assessed the application materials against the relevant checklists in the prescribed application form. Each assessment is contained within the appropriate approval checklist. These are included in **Appendix 1** for ease of reference.
36. Overall, my assessment is that the application is considered to meet the information requirements of the Act, with the information provided containing sufficient detail to satisfy the purpose for which is required.

Recommendation

37. It is recommended that you, under delegated authority from the EPA, determine the Ryans Road Industrial Area application to be complete, pursuant to Section 46 of the Act.

38. Once the EPA has determined the application to be complete, it must decide whether the substantive application has a competing application under section 47(3) (under delegation from the Minister for Infrastructure under section 47(10)) within 10 working days from the date of the completeness decision.
39. Once the EPA has made the decision under section 47(3), the EPA can provide the application to the panel convener to commence consideration and decision of the application by the panel.

Appendix 1: Assessment of section 44 sufficiency

This application seeks the following approval(s) under the Act:

- A resource consent, change to or cancellation of a resource consent: **checklist A**
- A resource consent, change to or cancellation of a resource consent: **checklist A1 – subdivision or reclamation**
- A wildlife approval: **checklist E**
- Information requirements for all applications **checklist J**.

CHECKLIST A – Resource consent, change to or cancellation of a resource consent

CHECKLIST A1 – Subdivision or reclamation resource consent

CHECKLIST E – Wildlife approval

CHECKLIST J – Listed project information requirements

Appendix 2: Consultation Responses

The following agencies were consulted with to inform the assessment of the application for completeness. Each agency was requested to confirm whether the application documentation provided by the EPA regarding the proposal as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose of the Act in accordance with section 44 of the Act.

Canterbury Regional Council
Christchurch City Council
The Ministry for Environment
The Department of Conservation.

The responses of these agencies can be read verbatim below.

RMA254537 – Carter Group Limited Fast Track Proposal
Ryans Road Industrial Development – Harewood, Christchurch
Executive Summary

Status: Applicant is lodging a substantive application under the Fast-track Approvals Act (FTAA) 2024. The EPA is currently deciding whether the amended substantive application is complete and within scope under section 46 of the FTAA, after initially returning the application on 14 April 2025.

Activity Description: Develop a 55-hectare industrial subdivision at 104 Ryans Road, delivering 126 freehold industrial lots, with infrastructure such as roads, three-waters utilities, and landscaping.

Record Number: RMA254537

Date Comment sought from EPA: 28 April 2025

Due Date: 5 May 2025

Key issues Identified:

- Feedback was provided to the EPA on the Ryans Road Industrial Development substantive application on 31 March 2025. Our comments in the current response do not alter or change the position or comments contained in the letter dated 31 March 2025 and the CRC request that these comments are considered by the EPA as part of their process.
- It is the view of the CRC that the information provided in the amended substantive application (including appendices) is considered to include sufficient information relating to the activity.

Dear **s 9(2)(g)(ii)**

Thank you for your letter dated 28 April 2025, regarding the Ryans Road Industrial Development, from Carter Group Limited (Carter Group).

Please find the response to the specific questions raised in the above letter from the Canterbury Regional Council (CRC).

1. Confirm that the written notice prepared by Council remains accurate and final at the time of receiving this letter.

CRC can confirm that the information contained in the written notice (dated 21 February 2025) remains accurate as at the date of this letter.

2. To inform the EPA’s completeness assessment of the application, could you please let us know, in your view, whether the attached documentation regarding the RMA approvals as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

The CRC has reviewed the updated information being:

- a. Amendments to Table 4 (Consultation Summary) of the AEE to include consultation with MfE and Mana Whenua;
- b. Amendments to Table 2 (Assessment of Mana Whenua recommendations) of the AEE to demonstrate how concerns raised by mana whenua have been addressed by the proposal;
- c. Amendments to Appendix 24 (Consultation Documents and Records); and
- d. Additional Appendix 38 (Lizard Surveys).

It is the view of the CRC that the updated/additional information provided by Carter Group Limited meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

It is the view of the CRC that the information provided in the amended substantive application (including appendices) is considered to include sufficient information relating to the activity, including an assessment of the activity's effects in accordance with s88 of the RMA.

Please note, that the comments (and associated appendices) provided in the letter sent to the EPA on 31 March 2025 still stand in relation to this proposal and for completeness are contained in **Appendix A** to this letter. The response contained in this letter does not alter or change the position or comments contained in the letter dated 31 March 2025, and CRC request that these comments are considered by the EPA as part of their process to determine the completeness of the amended application.

We trust that this information assists you determining the completeness of the application regarding the Ryans Road Industrial Development, from Carter Group Limited (Carter Group), under section 46(1) of the Act.

Please advise if you need any further clarification on any matters raised in this letter. We look forward to working with you further on this application if it is considered to meet section 46(1) of the Act.

Kind regards,

9(2)(g)(ii)

Director Operations

Appendix A – Copy of Response from the CRC dated 31 March 2025

Tēnā koe s 9(2)(g)(ii)

Thank you for your letter dated 25 March 2025, regarding the Ryans Road Industrial Development, from Carter Group Limited (Carter Group).

Please find the response to the specific questions raised in the above letter from the Canterbury Regional Council (CRC).

1. (Specific questions relating to this application in accordance with section 30 of the Act) Confirm that the written notice prepared by Council remains accurate at final at the time of receiving this letter.

CRC can confirm that the information contained in the written notice (dated 21 February 2025) remains accurate as at the date of this letter.

2. The substantive application includes applications for the following approvals under the Resource Management Act 1991 (RMA) that Environment Canterbury Regional Council is the relevant consent authority for: a resource consent that would otherwise be applied for under the RMA (section 42(4)(a) of the Fast Track Approvals Act ('Act')).

Key elements of the proposal, which would require CRCs consideration, include:

- a. Earthworks (including those over a HAIL site).
- b. Damming, diversion, take and discharge within the Paparua Water Race along Ryans Road. The Paparua water race is a stockwater race and is classified as an artificial waterway
- c. Construction phase and operational stormwater discharge.

Based on the information provided in the substantive application (and its Appendices), CRC considers that rules within the Canterbury Land and Water Regional Plan (LWRP) and the Canterbury Air Regional Plan (CARP), would apply.

CRC considers that the relevant documents identified by Carter Group in paragraph 117 of the Assessment of Environmental Effects (AEE) is correct, and that Carter

Group have assessed their proposal against the relevant Plans with regards to regional consenting.

The table In **Appendix A** of this letter, identifies the specific rules triggered in the above plans by the proposed activities, and the consents that would be required by the CRC under those rules.

As detailed in **Appendix A**, CRC considers that the assessment contained in Appendix 19 incorrectly assesses the proposal against Rules 5.116-5.118 in terms of the take and use of water and does not properly identify the relevant rules in the LWRP for the diversion, discharge and damming of the Paparua Water Race to enable/ carryout works.

Rules 5.116-5.118 seek to control a take for the purpose of construction (e.g. dust suppression), not the diversion of the Paparua Water Race, installation of the pipe and associated damming, take, diversion and discharge related to these works.

CRC consider that the correct rules to assess the proposed activities relating to the Paparua Water Race would be:

- a. Rule 5.127 – Non-consumptive taking and using of water from a... artificial watercourse and discharge of the of the same water to the same... artificial watercourse that does not meet one or more of the conditions in Rule 5.126 is a non-complying Activity.
 - a. Section 14 consent related to the take and use of water – Non-Complying
 - b. Section 15 consent related to the discharge of that water – Non-Complying
- b. Rule 5.141A – the placement, installation... of any structure, excluding dams... or any diversion or discharge in an artificial watercourse, that does not comply with Rules 5.135 to 5.141 is a discretionary activity.
 - a. Section 14 consent related to the diversion of water – Discretionary
 - b. Section 15 consent related to the discharge of water within the artificial watercourse – Discretionary
- c. Rule 5.154 – The damming of water... and the constructing, using, altering, maintaining and operating of dam structures within the bed of a river, including any damming or impounding of water outside of the bed of the river or natural lake is a permitted activity, provided the following conditions are met...
 - a. Section 14 consent related to the damming of water (within the Paparua Water Race to enable works) - Permitted

Based on this assessment above, Carter Group would require the following consents:

Section 9 Consent (Land Use Consent):

- Earthworks over aquifers – **Restricted Discretionary**

Section 14 Consent (Water Permit):

- Non-Consumptive take and use related to diversion of Paparua Water Race – **Non-Complying**
- Diversion of Paparua Water Race – **Discretionary**
- Damming of the Paparua Water Race - **Permitted**

Section 15 Consent (Discharge Consent):

- Discharge of water from the (non-consumptive) take of water from the Paparua Water Race to enable diversion – **Non-Complying**
- Discharge of water within the Paparua Water Race – **Discretionary**

3. Whether that substantive application made available to CRC, meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

CRC notes that while the substantive application (and **Appendix 19**), has not assessed the proposal against Rules 5.127, 5.141A and 5.154 (which would trigger consent), this would not alter the overall activity status (Non-Complying) of the proposal.

It is also considered that the information provided in the substantive application (including appendices) is considered to include sufficient information relating to the activity, including as assessment of the activities effects in accordance with s88 of the RMA.

We trust that this information assists you determining the completeness of the application regarding the Ryans Road Industrial Development, from Carter Group Limited, under section 46(1) of the Act.

Please advise if you need any further clarification on any matters raised in this letter.

We look forward to working with you further on this application if it is considered to meet section 46(1) of the Act.

Nāku iti noa, nā

Dr Stefanie Rixecker
Chief Executive

Appendix A – Rules triggered in the LWRP and CARP (referenced to in 31 March 2025 letter from ECAN)

Canterbury Land and Water Regional Plan (LWRP)		
Rule Trigger	Proposed Activity	Consent Requirement

<p>5.94B – The discharge of construction-phase stormwater, other than into or from a reticulated stormwater system, into a surface waterbody, or onto or into land in circumstances where a contaminant may enter groundwater or surface water, that does not meet one or more of the conditions of Rule 5.94A is a restricted discretionary activity.</p> <p>The exercise of discretion is restricted to the following matters:</p> <ol style="list-style-type: none"> 1. The actual and potential effects of the discharge on the quality of surface water, aquatic ecosystems, Ngāi Tahu cultural values; and 2. The actual and potential effects of the discharge on the quality and safety of human and animal drinking water; and 3. The actual and potential adverse environmental effects of the quantity of water to be discharged on the banks or bed of a waterbody or on its flood carrying capacity, and on the capacity of the network to convey that discharge; and 4. The potential benefits of the activity to the applicant, the community and the environment 	<p>Discharge of construction phase stormwater</p>	<p>Consent required under s15 of the RMA</p> <p>Restricted Discretionary Activity</p>
<p>5.97 – The discharge of stormwater, other than from a reticulated stormwater system, into a river, lake, wetland or artificial watercourse or onto or into land in circumstances where a contaminant may enter water that does not meet one or more of the conditions of Rule 5.95</p>	<p>Discharge of stormwater from roads, berms and footpaths to ground from two catchment areas within the site, via a reticulated network for treatment and attenuation to of of</p>	<p>Consent required under s15 of the RMA</p> <p>Non-Complying Activity</p>

<p>or Rule 5.96; and the discharge of stormwater or construction-phase stormwater into a reticulated stormwater system that does not meet the condition of Rule 5.93A; is a discretionary activity except that within the boundaries of Christchurch City it is a non-complying activity.</p>	<p>two first flush infiltration basin/soakpit systems.</p>	
	<p>Discharge of operational stormwater Discharge of stormwater from lots will be directed to an onsite proprietary treatment device for treatment of the 'first flush' flow prior to disposal to ground via soak pits.</p>	<p>Consent required under s15 of the RMA</p> <p>Non-Complying Activity</p>
<p>5.154 The damming of water in the bed of a river and the constructing, using, altering, maintaining and operating of dam structures within the bed of a river, including any damming or impounding of water outside the bed of a river or natural lake is a permitted activity, provided the following conditions are met:</p> <p>1. For the damming or impounding of water outside the bed of a river or natural lake:</p> <p>a. the volume of water impounded is less than 20,000 m³ ; or</p> <p>b. the maximum depth of water impounded above ground level (measured as the maximum vertical distance between the crest of the dam and the ground level immediately adjacent to dam) is less than 4 m; and</p> <p>c. if the volume of water impounded is greater than 1,000 m³ , the design and construction of the dam is certified by a Recognised Engineer; and</p>	<p>Damming of water from the Papanui Water Race to enable piping along the length</p>	<p>Consent not required for the damming of water to enable the temporary diversion as, based on the substantive application, the proposed activity would meet the permitted activity standards of Rule 5.154.</p> <p>Permitted Activity</p>

<p>d. the land is not contaminated or potentially contaminated.</p> <p>2. For the damming of water in the bed of a river and the constructing, altering, using, maintaining and operating of dam structures within the bed of a river:</p> <p>a. the volume of water impounded is less than 5,000 m³ ; and</p> <p>b. the maximum depth of water is less than 3 m; and</p> <p>c. the dam does not impound the full flow of the river; and</p> <p>d. any existing passage of fish is not impeded; and</p> <p>e. the damming of water does not cause water flow to fail to meet any limits in Sections 6 to 15 or fall below the minimum flow for the surface waterbody if the waterbody is subject to a minimum flow as set out in Sections 6 to 15; and</p> <p>f. the dam is not located in a river listed as a high naturalness river in Sections 6 to 15 or in the mainstem of any river; and</p> <p>g. the damming does not prevent water being taken by any domestic or stock water supply, or reduce the reliability of supply of any existing legally authorised water take</p>		
<p>5.126 The non-consumptive taking and use of water from a lake, river or artificial watercourse and discharge of the same water to the same lake, river or artificial watercourse is a restricted discretionary activity, provided the following conditions are met:</p>	<p>Take of water from the Paparua Water Race to enable piping along the length</p>	<p>It is not considered that the proposed activity will meet Rule 5.126(3), and therefore Rule 5.127 would apply.</p> <p>Consent requirement under s14 of the RMA</p>

<p>1. Limits have been set for that surface waterbody in Sections 6 to 15 or the lake or river is subject to a Water Conservation Order; and</p> <p>2. The taking of water and subsequent discharge does not result in any exceedance of any limit set for that waterbody in Sections 6 to 15 or flow and allocation regime set out in the Water Conservation Order; and</p> <p>3. Other than for the replacement of existing consents for activities provided for under Policy 4.51, the maximum distance from the point of take to the point of discharge is not more than 250 m; and</p> <p>4. Other than for the replacement of existing consents for activities provided for under Policy 4.51, the take is not from a wetland, hāpua or a high naturalness lake or river that is listed in Sections 6 to 15.</p> <p>5.127 – The non-consumptive taking and use of water from a lake, river or artificial watercourse and discharge of the same water to the same lake, river or artificial watercourse that does not meet one or more of the conditions in Rule 5.126 is a non-complying activity</p>	<p>Discharge of diverted/ over-pumped water from the Paparua Water Race to enable piping along the length</p>	<p>Non-Complying Activity</p> <p>It is not considered that the proposed activity will meet Rule 5.126(3), and therefore Rule 5.127 would apply.</p> <p>Consent requirement under s14 of the RMA</p> <p>Non-Complying Activity</p>
<p>5.140 Unless addressed by another rule in this Plan, the installation, alteration, extension, or removal of temporary structures and diversions associated with undertaking activities in Rules 5.135 to 5.139, military training activities, or artificial watercourses are</p>	<p>Diversion of water from the Paparua Water Race to enable piping along the length</p>	<p>Rules 5.135-5.139 apply only to the beds of rivers (the Paparua Water is an Artificial Water Course). Based on the substantive application, the proposed diversion would not meet Rule 5.140(2), 5.140(3) and therefore Rule 5.141A</p>

<p>permitted activities, provided the following conditions are met:</p> <ol style="list-style-type: none"> 1. The activity is not undertaken in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Critical Habitat; and 2. The temporary structure and diversion is in place for not more than 4 weeks in any 12 month period; and 3. The activity does not prevent any existing fish passage or result in the stranding of fish; and 4. Any diversion of water out of a river channel does not reduce the wetted width of that existing channel by more than 25% at any point; and 5. For any temporary culvert in a river: <ol style="list-style-type: none"> a. The maximum length of the culvert is 14m; and b. The culvert is and open bottom culvert, or the base of the culvert is embedded below bed level by 25% to 50% of the culvert height and is covered with water at the estimated 7DMALF; and c. The maximum width of the river bed at the point of the crossing is 5 m; and d. The activity is not in a river, lake or artificial watercourse managed for flood control or drainage purposes unless written permission has been obtained from the authority 		<p>would apply. Consent requirement under s14 of the RMA Discretionary Activity</p>
	<p>Discharges associated with the temporary diversion resulting from the Paparua Water Race to enable piping along the length</p>	<p>Rules 5.135-5.139 apply only to the beds of rivers (the Paparua Water is an Artificial Water Course). Based on the substantive application, the proposed diversion would not meet Rule 5.140(2), 5.140(3) and therefore Rule 5.141A would apply. Consent requirement under s15 of the RMA Discretionary Activity</p>
	<p>Installation of a culvert in Paparua Water Race</p>	<p>Rules 5.135-5.139 apply only to the beds of rivers (the Paparua Water is an Artificial Water Course). Based on the substantive application, the proposed diversion (being required to enable culvert installation) would not meet Rule 5.140(2), 5.140(3) and therefore Rule 5.141A would apply. Consent requirement under s14 of the RMA Discretionary Activity</p>

<p>responsible for maintaining the flood and drainage carrying capacity of that water body or watercourse.</p> <p>5.141A – The placement, installation, erection, reconstruction, alteration or removal of any structure, excluding dams, on, in or under the bed of a lake or river, and including any associated excavation, disturbance, diversion and discharge in the bed of a lake or river, or any diversion or discharge in an artificial watercourse, that does not comply with Rules 5.135 to 5.141 is a discretionary activity.</p>		
<p>5.175 – The use of land to excavate material is a permitted activity, provided the following conditions are met:</p> <p>Over the Coastal Confined Gravel Aquifer System, as shown on the Planning Maps:</p> <p>there is more than 1 m of undisturbed material between the deepest part of the excavation and Aquifer 1; and</p> <p>if more than 100 m³ of material is excavated, the excavation does not occur within 50 m of any surface waterbody; or</p> <p>Over an unconfined or semi-confined aquifer:</p> <p>the volume of material excavated is less than 100 m³; or</p> <p>the volume of material excavated is more than 100 m³ and:</p> <p>there is more than 1 m of undisturbed material between the deepest part of the excavation and the highest groundwater level; and</p>	<p>Earthworks over an unconfined/semi-confined aquifer</p>	<p>Based on the substantive application, the proposed earthworks to enable infrastructure, piping and diversion would not comply with Rule 5.175(2)(b)(ii) and the volume overall exceed 100m³, and being within 50m of the Paparua Water Race. Therefore, rule 5.176 would apply.</p> <p>Consent requirement under s9 of the RMA</p> <p>Restricted Discretionary Activity</p>
	<p>Earthworks within riparian margins (Paparua Water Race, Ryans Rd)</p>	<p>Based on the substantive application, the proposed earthworks to enable infrastructure, piping and diversion would not comply with Rule 5.175(2)(b)(ii) and the volume overall exceed</p>

<p>the excavation does not occur within 50 m of any surface waterbody.</p> <p>5.176 – The use of land to excavate material that does not comply with one or more of the conditions of Rule 5.175 is a restricted discretionary activity. The exercise of discretion is restricted to the following matters:</p> <p>The actual and potential adverse environmental effects on the quality of water in aquifers, rivers, lakes, wetlands; and Any need for remediation or long-term treatment of the excavation; and The protection of the confining layer and maintaining levels and groundwater pressures in any confined aquifer, including any alternative methods or locations for the excavation; and The management of any exposed groundwater; and Any adverse effects on Ngāi Tahu values or on sites of significance to Ngāi Tahu, including wāhi tapu and wāhi taonga.</p>		<p>100m³, and being within 50m of the Paparua Water Race. Therefore, rule 5.176 would apply.</p> <p>Consent requirement under s9 of the RMA</p> <p>Restricted Discretionary Activity</p>
Canterbury Air Regional Plan (CARP)		
Relevant Activity	Proposed Activity	Consent Requirement
<p>7.32 – The discharge of dust to air beyond the boundary of the property of origin from the construction of buildings, land development activities, unsealed surfaces or unconsolidated land, is a permitted activity provided the following conditions, where applicable, are met:</p> <p>The building to be constructed is less than 3 stories in height, or where the building is greater than 3 stories in height, a</p>	<p>Earthworks activities</p>	<p>Based on the substantive application, the proposed earthworks would be managed in a manner which would achieve compliance with Rule 7.32.</p> <p>No consent required</p>

<p>dust management plan is prepared in accordance with Schedule 2 and implemented by the person responsible for the discharge into air; and</p> <p>The area of unsealed surface or unconsolidated land is less than 1000m² , or where the area of unsealed surface or unconsolidated land is greater than 1000m² a dust management plan is prepared in accordance with Schedule 2 and implemented by the person responsible for the discharge into air; and</p> <p>The discharge does not cause an offensive or objectionable effect beyond the boundary of the property of origin, when assessed in accordance with Schedule 2.</p>		<p>Permitted Activity</p>
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Consultation with Christchurch City Council

Fast Track Approvals Act 2024 – FTAA-2504-1054

Christchurch City Council Reference - RMA/2025/1208

104 RYANS ROAD & 20 GRAYS ROAD, HAREWOOD

The purpose of this letter is to comment on the completeness of the application made by Carter Group in relation to a proposal to subdivide and use land at 104 Ryans Road and 20 Grays Road, Harewood.

I have carried out an assessment of completeness against the matters in Schedule 5 as they relate to the functions of the Christchurch City Council as territorial authority, with the Christchurch City Council having previously provided comment on the completeness of an earlier application made in relation to this proposal on 1 April 2025 and 8 April 2025.

This letter is limited in scope to comment only on the changes made to the application since that comment was given. These changes relate to the inclusion of a record of consultation with the Ministry for the Environment and an additional Appendix, Appendix 38, being a record of lizard surveys undertaken on the site.

In relation to the information provided with the amended application, I have not identified areas in which the application is incomplete.

In relation to section 30 of the Fast Track Approvals Act 2024, I can confirm that the written notice provided by Council to the authorised person on 20 February 2024 remains accurate and final at the time of this letter.

I trust this assists in deciding whether the application is complete and within scope in accordance with section 46.

Yours sincerely,

9(2)(g)(ii)

Senior Planner

02/05/2025

Reporting Officer

9(2)(g)(ii)

Manager Resource Consents

02/05/2025

Delegated authority

Consultation with Ministry for the Environment

The Ministry for the Environment considers that the relevant consenting authorities would be best placed to respond to this query in the first instance.

Consultation with Department of Conservation

Completeness Response

Department of Conservation to Environmental Protection Authority

Overview

Project name	Ryans Roads Industrial Development
Project detail summary	Creating 126 freehold industrial lots, with infrastructure such as roads, three-waters utilities, and landscaping.
Project applicant	Carter Group Limited
EPA unique ref. no	FTAA-2504-1054
EPA Request Number	REQ001364Z3C7
Conservation approvals sought	Wildlife approval (as defined in clause 1 of Schedule 7 of the Act) (section 42(4)(h) of the Act)
EPA request summary	To inform the EPA's completeness assessment of the application, could you please let us know, in your view (DOC), whether the documentation provided by the EPA regarding the above approvals as provided by the applicant meet the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act
Date due to EPA	05/05/2025

Summary

On 28th April 2025 the Department of Conservation (DOC) received a request from the EPA seeking its views whether the Ryans Road Industrial Development application meets the requirements of s 42, 43 of the Fast-track Approvals Act 2024 (the Act) and whether the information is in sufficient detail to satisfy s44 of the Act.

The purpose of this document is to provide advice to assist the EPA in making its decision whether the Ryans Road Industrial Development substantive application lodged by the Carter Group complies with the requirements of s46(2) of the Act.

The advice covers compliance with the following:

- Information requirements for a Wildlife Approval (Schedule 7)
- Consultation requirements

DOC has assessed the requirements of Schedule 7 and provided its view on compliance against them.

Background

DOC is aware that this completeness check is for a relodged application following the return of the first substantive application for the Ryans Road Industrial Development on

the 14th April 2025 to the applicant. The reason the EPA provided for that decision was that the application did not comply with all the requirements of Section 46(2) of the Act. More specifically:

'Information to satisfy the requirements of section 13(4)(k). The application lacks a summary or evidence of consultation with the Ministry for the Environment (MfE) as the relevant administering agency of the Resource Management Act 1991 (RMA) under which approvals are sought'.

EPA Decision on Completeness 14 April 2025

EPA has advised in this request that there are specific changes to the relodged document as below.

Summary of changes to new lodgement

Amendments to the AEE:

- *11.1 Paragraph [373] and Table 4 (Consultation Summary) 1 has been amended to provide a summary of the consultation with MfE and an explanation of how it informed the project.*
- *11.2 Paragraphs [105] to [106], [115], [274] to [278] and [292], Table 2 (Assessment of Mana Whenua recommendations) 2 and Table 4 (Consultation Summary) 3 have been amended to refer to the Survey Report.*

Additional appendices:

- *Appendix 24 (Consultation Documents & Records) now includes the record of consultation with MfE (i.e. the MfE Feedback).*
- *Appendix 38 (Lizard Surveys) has been added to attach the Survey Report to the Amended Application.*

EPA request dated 28/04/2025

Scope of DOC's Response

DOC has considered the provision of additional information in relation to the Wildlife Approval sought e.g. *Appendix 38 Lizard Surveys* and has provided an amended response accordingly. DOC has provided some further commentary in places to contextualise its view.

DOC has not provided an assessment table in relation to Section 43 as these matters are largely for the EPA. DOC has noted its pre-lodgement engagement commentary as per Section 29 in Table 1 below.

Summary - DOC commentary on compliance with information requirements

In DOC's view the:

- information provided in the application in accordance with Section 43 aligns with information requirements, except that:
- schedule 7, clause 2(1)(b) to the FTAA 2024 requires an application for a wildlife approval to identify the actions the applicant wishes to carry out and clause 2 (1)(h) requires the identification of **where** they will be carried out. The release locations for the activity of relocating potentially salvaged lizards has not been identified
 - o DOC anticipates a panel may require this information to be provided during the process to make its decision on the wildlife approval.
 - o DOC acknowledges the methods as set out in the Lizard Management Plan (LMP) anticipate that relocation sites (including suitable habitat) will be identified if Lizards are located on the project site. Given lizards have now been confirmed on the project site (via surveys) updating the LMP to specify the relocation sites (as part of the process for a Wildlife Approval) would address this insufficiency.
 - o DOC notes that finding and establishing suitable relocation sites for lizards can be a time-consuming process but would be a fundamental part of a suitable (or giving effect to a suitable) lizard management plan.

Documents reviewed

- 1) *Appendix 7 Lizard Habitat Assessment and Lizard Management Plan*
- 2) *Appendix 38 Lizard Surveys*

Section 29 – listed project consultation requirements

Section 29(1)(a) requires that, before lodging an application for a **listed project**, the authorised person for the project must consult the persons and groups referred to in section 11. DOC is included in this per section 11(1)(e) as we are a relevant administering agency.

Table 1: Section 29 Commentary

<i>Date</i>	<i>Nature of consultation</i>
20/02/2025	<p>The applicant engaged with DOC prior to lodgement of the substantive application.</p> <p>It is noted that DOC advised further surveys should be undertaken to inform the LMP, we note the applicant has provided survey data with the relodged application. As per our pre-lodgement consultation summary provided in the application:</p> <ul style="list-style-type: none"> • If a survey determines lizards are present the LMP should include identifying suitable habitats for relocation • Has the applicant considered any other relevant approvals that may be needed e.g. wildlife/fish passage

Applications for wildlife approvals

Clause 2 of Schedule 7 outlines the information required in an application for a wildlife approval.

Table 2: DOC Commentary on compliance with Schedule 7 information requirements and Sufficiency (Section 44)

Relevant section	Is the information present? Y/N	Is the information provided in sufficient detail?	Comments
Schedule 7 clause 2(1) For the purposes of section 43(3)(h), an application for a wildlife approval must—			
a. specify the purpose of the proposed activity:	Yes	Yes	
b. identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or of public conservation land):	Yes	Yes	

c. include an assessment of the activity and its impacts against the purpose of the Wildlife Act 1953:	Yes	Yes	
d. list protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted:	Yes	Yes	
e. outline impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System):	Yes	Yes	
f. state how the methods proposed to be used to conduct the actions specified under paragraph (b) will ensure that best practice standards are met:	Yes	No	<p>It is not sufficiently stated/demonstrated how the methods proposed to relocate lizards will ensure best practice methods are met.</p> <p>Best practice would include the identification of a suitable relocation site to ensure effective planning and an adequate protection of wildlife. From a practical perspective e.g. given the potential permissions involved (relocation site owners to agree) and timeframes involved to prepare habitat best practice is to identify relocation sites prior to the provision of an approval.</p>
g. describe the methods to be used to safely, efficiently, and humanely catch, hold, or	Yes	Yes	

kill the animals and identify relevant animal ethics processes:			
h. state the location or locations in which the activity will be carried out, including a map (and GPS co- ordinates if available):	Yes/No	No	The release locations for the activity of relocating potentially salvaged lizards has not been identified (as per section (f) of this Table)
i. state whether authorisation is sought to temporarily hold or relocate wildlife:	Yes	Yes	
j. list all actual and potential wildlife effects (adverse or positive) of the proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site:	Yes	No	Specific actual and potential effects in relation to relocation can not be listed as relocation location not identified.
k. where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife):	Yes	Yes	
l. state whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act 1953:	Yes	Yes	
m. state whether the applicant or any company director, trustee, partner, or anyone else	Yes	Yes	

involved with the application has any current criminal charges under the Wildlife Act 1953 pending before a court:			
n. provide proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts:	N/A	N/A	To be determined by the EPA
o. provide any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal.	Yes	Yes	

CHECKLIST A – Resource consent, change to or cancellation of a resource consent

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	Application Reference (Name of document, section and page)	EPA Office use only – EPA comments on completeness Note – for reference to the AEE, page numbers refer to the PDF reader rather than the documents.
5(1)(a)	A description of the proposed activity	AEE, the Proposal, pages 10-19;	Addressed, description of activities is provided, p 20, para 62-107 of the AEE.
5(1)(b)	A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to— i. a statutory area (as defined in the relevant Treaty settlement Act); or ii. ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or iii. a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011	AEE, the Proposal, pages 10-19; (b) AEE, Site and Surrounding Environment, pages 3-9.	Addressed, description of site and surrounding environment and contextual maps are provided, pp. 13-19, paras. 28-61 of the AEE. See also Appendix 3 Capture Scheme Plans. Christchurch City Council (CCC) also agree that the site is not in proximity to a statutory area, Ngā rohe moana o ngā hapū o Ngāti Porou, or a protected customary rights area.
5(1)(c)	Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being: <ul style="list-style-type: none"> • section 42; and • sections 43 and 44; and • relates solely to a listed project or a referred project; and 	Covering letter to the Application, page 1 para [5]	Addressed, Confirmation that the activity complies with section 46(2)(a), (b), and (d) is provided in the covering letter to the application The application relates solely to the listed project of ‘Subdivide and develop land for industrial use’ at the approximate geographical location of ‘55.5 hectares at 104

	<ul style="list-style-type: none"> any fee, charge, or levy payable under regulations in respect of the application is paid. <p><i>Guidance note: Section 46 provides for the EPA to decide whether the substantive application is complete and within scope. The EPA will need to be satisfied that the application complies with these requirements. These matters are addressed throughout the substantive application form and relevant checklist.</i></p>		<p><i>Ryans Road, Harewood, Christchurch</i>’ as sited in Schedule 2 of the Act. It is noted that the site includes ‘balance land’ to the east of Grays Road, I believe that this is still considered within scope as the purpose is to provide for stormwater and water utility requirements, which fit the interpretation of ‘project’ under the Act.</p> <p>The application does not involve an ineligible activity.</p> <p>The application fee and levy has been paid, received by the EPA on 24 March 2025.</p>
5(1)(d) and 5(6)	<p>The full name and address of—</p> <ol style="list-style-type: none"> each owner of the site and of land adjacent to the site; and each occupier of the site and of land adjacent to the site whom the applicant is unable to identify after reasonable inquiry; <p>If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the applicant must include a statement to that effect (clause 5(6)).</p>	Appendix 35 (Contact Details of Adjacent owners and occupiers)	<p>Addressed, full names and addresses of adjacent landowners and occupiers where known) have been provided in Appendix 35.</p> <p>The names of the owners of the site (104 Ryans Road - Lot 4 DP 22679, 20 Grays Road - Part Lot 1 DP 2837, and Part Lot 3 DP 22679) are found in the Record of Title certificates (Appendix 2).</p>
5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates	There are no other activities that are part of the proposal to which the consent application relates.	Addressed , the application states there are no other activities that are part of the proposal.
5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates	There are no other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates	Addressed , the application states there are no other approvals to which the consent relates.

5(1)(g)	An assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991	AEE, Resource Management Act 1991 Considerations, pages 79-81	Addressed , Resource Management Act 1991 Considerations, Part 2 (page 89, paras. 388-394).
5(1)(h) (and also Clauses 5(2) and 5(3))	<p>An assessment of the activity against any relevant provisions in any of the following documents:</p> <ul style="list-style-type: none"> • a national environmental standard: • other regulations made under the Resource Management Act 1991: • a national policy statement: • a New Zealand coastal policy statement: • a regional policy statement or proposed regional policy statement: • a plan or proposed plan: • a planning document recognised by a relevant iwi authority and lodged with a local authority. <p>assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being:</p> <ul style="list-style-type: none"> • any relevant objectives, policies or rules in the documents listed; and • any requirement, condition, or permission in any rules in any of those documents; and • any other requirements in any of those documents 	AEE, Relevant Provisions of Planning Instruments, pages 69-74	<p>Addressed, see pp 79-123 of the AEE, also see appendix 32</p> <p>Assessment provided against:</p> <p><u>Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES-CS)</u> – The AEE E includes an assessment of the proposal in relation to the NES-CS at paragraphs 118-123.</p> <p><u>National Policy Statement for Freshwater Management 2020</u> – relevant provisions are assessed in Appendix 32. Based on their findings within their technical assessments, they have assessed the proposal as being consistent with the sole objective of the policy statement.</p> <p><u>National Policy Statement for Indigenous Biodiversity 2023</u> – relevant provisions are assessed in Appendix 32. Based on their findings within their technical assessments, they have assessed the proposal as being consistent with the sole objective of the policy statement.</p> <p><u>National Policy Statement for Highly Productive Land 2022</u> – The applicant has sought legal advice (Appendix 37) in regards to whether the site, which is zoned as Rural Urban Fringe (RUF), is a General Rural or Rural Production zone. The advice states that advice states that the site does not apply under the definition of highly productive land.</p>

		<p>Assessment has still been included in Appendix 32, should the panel considerations take alternative interpretation. See also p 80, paras. 340-46 of the AEE.</p> <p><u>National Policy Statement on Urban Development 2020</u> - relevant provisions are assessed in Appendix 32. The proposal has been assessed as being consistent with the policy statement.</p> <p><u>Canterbury Regional Policy Statement</u> – relevant objectives and policies include chapters 5, 6, 7, 11, 12, 15, 16, 17, and 19. These provisions are assessed in Appendix 32.</p> <p><u>Canterbury Land and Water Regional Plan</u> – relevant objectives include Objectives 3.1, 3.8, 3.16, 3.19, 3.23. These provisions are assessed in Appendix 32. Based on their findings within their technical assessments, they have assessed the proposal as being consistent with the sole objective of the policy statement.</p> <p><u>Canterbury Air Regional Plan</u> – relevant objectives and policies are assessed in Appendix 32.</p> <p><u>The District Plan</u> - relevant objectives and policies are assessed in Appendix 32.</p> <p><u>Mahaanui Iwi Management Plan</u> – assessment of the relevant provisions are set out in Appendix 32.</p> <p><u>Canterbury Regional Land Transport Strategy</u> – assessment included in Appendix 32.</p>
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5(1)(i)	Information about any Treaty settlements that apply in the area covered by the consent application, including— i. identification of the relevant provisions in those Treaty settlements; and ii. a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area	No Treaty Settlements apply.	Addressed , the application has stated that no treaty settlements apply. See p.9, para. 2.10 of the Covering letter (dated 21 March 2025) attachment.
5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011;	There are no relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011	Not applicable - application indicated that this clause is not relevant to the proposal.
5(1)(k)	The conditions that the applicant proposes for the resource consent.	Appendix 18 (Proposed Conditions of Consent)	Addressed , proposed conditions Appendix 18. Part 1, pp 1-4: CCC Land Use Consent Conditions Part 2, pp 5-22: CCC Subdivision Consent Conditions Part 3, pp 22-26: CRC Earthworks/Land Use Conditions Part 4, pp 27-35: CRC Stormwater Discharge Conditions Part 6, pp 35-36: DOC conditions.
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,— i. a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and	Appendix 33 (Canterbury Regional Council) Appendix 34 (Christchurch City Council)	Addressed , a written notice has been provided with the application from Environment Canterbury, dated 21 February 2025 (appendix 33).

	<p>ii. if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware of about the existing resource consent referred to in the notice.</p>		<p>A written notice has been provided with the application from Christchurch City Council, dated 20 February 2025 (appendix 34). Both councils have also confirmed that the written notice remains accurate and final at the time of receiving the consultation package sent by the EPA on 31 March 2025.</p>
5(4)(a)	<p>An assessment of the activity's effects on the environment that includes the information required by clause 6. <i>Guidance note: See rows below for requirements in clause 6.</i></p>	<p>AEE More details in the rows below</p>	<p>Addressed, see comments regarding cl 6 below</p>
5(4)(b)	<p>An assessment of the activity's effects on the environment that covers the matters specified in clause 7. <i>Guidance note: See rows below for requirements in clause 7.</i></p>	<p>AEE More details in the rows below</p>	<p>Addressed, see comments regarding cl 7 below</p>
6	<p>The assessment of an activity's effects on the environment must include the following information:</p> <ul style="list-style-type: none"> a. an assessment of the actual or potential effects on the environment: b. if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use: c. if the activity includes the discharge of any contaminant, a description of— <ul style="list-style-type: none"> i. the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and ii. any possible alternative methods of discharge, including discharge into any other receiving environment: 	<p>AEE (a) Assessment of Actual and Potential Effects on the Environment, pages 29-68 (b) N/A (c) N/A (d) AEE, Mitigation Measures, pages 77-78 (e) AEE, Consultation, pages 75-77 (f) AEE, Consultation, pages 75-77</p>	<p>Addressed, as complete for the purposes of s46, however, note the feedback received from CCC regarding mitigation measures (Councils' feedback may be read in Appendix 3 to this completeness memo). (a) assessment provided, pp. 39-78 of the AEE (b) Not applicable, the activity does not include the use of hazardous installations. (c) Not applicable, no inclusion of discharge of any contaminant. (d) Mitigation measures are identified throughout the AEE (p.87), with mitigation proposed through design and required by conditions where relevant (Appendix 18). (e) addressed, however, the AEE does not specifically list individuals who might be</p>

	<p>d. a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity:</p> <p>e. identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal:</p> <p>f. if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision:</p> <p>g. if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved:</p> <p>h. an assessment of any effects of the activity on the exercise of a protected customary right.</p> <p><i>Guidance note: Clause 6(2) provides that a consent application need not include any additional information specified in a relevant policy statement or plan that would be required in an assessment of environmental effects under clause 6(2) or 7(2) of Schedule 4 of the Resource Management Act.</i></p>	<p>(g) AEE, Mitigation Measures and Monitoring page 77; Appendix 18 (Proposed consent conditions)</p> <p>(h) N/A</p>	<p>impacted. It does identify potentially affected persons concerning landscape and visual effects (see paragraph 167 of the AEE and Appendix 11), as well as noise from industrial activities (see paragraph 315 of the AEE and Appendix 04). Additionally, a consultation record is included in Appendix 24, with initial responses from Runanga documented in Appendices 29 and 30.</p> <p>(f) addressed under Consultation pp. 85-87 of the AEE.</p> <p>(g) addressed, p.87, Appendix 18</p> <p>(h) Not applicable, the activity is not relevant.</p>
7	<p>The assessment of an activity's effects on the environment must cover the following matters:</p> <p>a. any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:</p> <p>b. any physical effect on the locality, including landscape and visual effects:</p>	<p>(a) AEE, Actual or Potential Effects (a), pages 29-36; see also Appendix 20 (Economics Assessment); Appendix 21 (Market Assessment) and Appendix 22 (Industrial Land Demand Assessment).</p> <p>(b) AEE, Actual and Potential Effects (b), pages 36-56; see also Appendix 11</p>	<p>Addressed, as complete for the purposes of s46, however, note the feedback received from CCC.</p> <p>(a) Addressed see pp.41-46, paras. 139-161 of the AEE.</p> <p>(b) addressed, effects assessed: - landscape and visual amenity (pp. 46-48, paras. 162-172 of the AEE and Appendix 11)</p>

<p>c. any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:</p> <p>d. any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:</p> <p>e. any discharge of contaminants into the environment and options for the treatment and disposal of contaminants:</p> <p>f. any unreasonable emission of noise:</p> <p>g. any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.</p>	<p>Landscape and Visual Impact Assessment; Appendix 23 Urban Design Assessment; Appendix 15 (lighting Assessment); Appendix 10 (Integrated Traffic Assessment); Appendix 9 (Avifauna Assessment); Appendix 4 (Acoustic Assessment); Appendix 25 (Green House Gas Emissions Assessment); Appendix 26 (Highly Productive Land and Soils Assessment); Appendix 27 (Water Quality Technical Assessment); Appendix 13 (Stormwater Management Technical Assessment); and Appendix 12 (Three Water Service Report).</p> <p>(c) AEE, Actual and Potential Effects pages 56-58; see also Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan); Appendix 8 (Wetlands and Waterways Assessment); and Appendix 9 (Avifauna Assessment).</p> <p>(d) AEE, Actual and Potential Effects (d), pages 59-61.</p> <p>(e) AEE, Actual and Potential Effects (e); see also Appendix 14 (Infrastructure Report); Appendix 16 (Earthworks Management Plan); and Appendix 6 (Detailed Site Investigation).</p> <p>(f) AEE, Actual and Potential Effects (f), pages 64-66; see also Appendix 4 (Acoustic Assessment).</p>	<p>- urban design (pp. 48-49, paras. 173-177 of the AEE and Appendix 23)</p> <p>- lighting (pp.49-52, paras. 178- 187 of the AEE and Appendix 15)</p> <p>- transport (pp. 52-54, paras. 188- 203 of the AEE and Appendix 10)</p> <p>- regionally significant infrastructure and reverse sensitivity (pp. 54-, paras. 204-235 of the AEE, Appendix 3, 4, 9)</p> <p>- climate change and green house gas (paras. 236-239 of the AEE, Appendix 25)</p> <p>- highly productive soils and rural production (paras. 240-249 of the AEE, Appendix 32)</p> <p>- three waters infrastructure (paras. 250-264, Appendix 12, 13)</p> <p>- water quality (paras. 265-274 of the AEE and Appendix 27, Appendix 13, Appendix 12).</p> <p>(c) Addressed, the AEE outlines Ecology and Biodiversity Effects (Herpetology, Freshwater, and Avifauna) on pp. 66-68. Paras. 274-279 of the AEE relate specifically to herpetology, to which the Lizard Management Plan (Appendix 7) is referenced. Baseline surveys carried out have confirmed presence of lizards at the site.</p> <p>(d) Addressed, the AEE evaluates the following impacts:</p> <p>- Cultural Effects (detailed in paras. 290-297, Appendix 28, and initial feedback from Te Ngāi Tūāhuriri Rūnanga and Te Taumutu Rūnanga found in Appendix 29 and 30).</p> <p>(e) Addressed, paras. 298-312 (appendix 12, 16) and (appendix 6)</p>
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		(g) AEE, Actual and Potential Effects (g), pages 66-68; see also Appendix 5 (Geotechnical Assessment); and Appendix 31 (Flood Management Assessment)	(f) Addressed , noise effects are assessed in paras. 322-325 of the AEE (g) Addressed , geotechnical hazards are assessed (paras. 322-325 of the AEE and Appendix 5)
5(5)(a)	If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under section 87A(1) of the Resource Management Act 1991)	Appendix 32 (Assessment of Planning Provisions)	Addressed , The applicant has reviewed the proposal in relation to the Christchurch District and Regional Plan as detailed in Appendix 19 . This section outlines the areas where consent is necessary and highlights the aspects of the proposal that meets Plan standards, with references to specialist reports
5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set out in that document	N/A	Not applicable – activity does not occur in an area associated by a customary marine title group
5(5)(c)	If the activity is to occur in an area that is taiāpure local fishery, a mātaihai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.	N/A	Not applicable – activity does not occur in an area that is relevant to this clause

CHECKLIST A1 – Subdivision or reclamation resource consent

Clause, Schedule 5	Information required for an application for a subdivision consent or a reclamation consent (in addition to the information required in Checklist A)	Application Reference	EPA office use only
If this application is for a subdivision consent, please adequately define the matters set out in clause 8(1) below.			
8(1)(a)	The position of all new boundaries	Appendix (Capture Scheme Plans) page 4	Addressed , drawings of the proposed subdivision boundaries are provided in Appendix 03 Capture Scheme Plans , p. 4.
8(1)(b)	The areas of all new allotments, unless the subdivision involves a cross lease or company lease or unit plan	Appendix 3 (Capture Scheme Plans) page 3	Addressed , drawings of the proposed allotments are provided in Appendix 03 Capture Scheme Plans , p. 4.
8(1)(c)	The locations and areas of new reserves to be created, including any esplanade reserves and esplanade strips	Local reserves/green spaces are not proposed, but stormwater reserves (SMAS) and a water utility reserve are proposed see AEE, pages 12-13, 54-55; Appendix 3 (Capture Scheme Plans) page 4	Addressed , see p. 23 and pp.64-65 of the AEE.
8(1)(d)	The locations and areas of existing esplanade reserves, esplanade strips, and access strips	There are no existing or proposed esplanade reserves, esplanade strips or access strips. See Appendix 3 (Capture Scheme Plans)	N/A
8(1)(e)	The locations and areas of any part of the bed of a river or lake to be vested in a territorial authority under section 237A of the Resource Management Act 1991	N/A	N/A

8(1)(f)	The locations and areas of any land within the coastal marine area that is to become part of the common marine and coastal area under section 237A of the Resource Management Act 1991	N/A	N/A
8(1)(g)	The locations and areas of land to be set aside as new roads	AEE, Subdivision (roading), page 12; Appendix 3 (Capture Scheme Plans), pages 17-33	Addressed , p. 22 of the AEE and Appendix 03 Capture Scheme Plans , pp. 17-33.

CHECKLIST E – Wildlife approval

Clause, Schedule 7	Information required for an approval described in section 42(4)(h) (Wildlife Act approval), clause 2 of Schedule 7	Application Reference (Name of document, section and page)	EPA Office use only – EPA comments on completeness Note – for reference to the AEE, page numbers refer to the PDF reader rather than the documents.
2(1)(a)	Specify the purpose of the proposed activity	Appendix 7 (Lizard Habitat Assessment and	Addressed , provided within the AEE (p. 11, para. 25) and Appendix 7 Introduction (p. 18) and p. 22)
2(1)(b)	Identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land) <i>Guidance note: Under clause 2(2) if the substantive application is to be lodged by more than 1 authorised person, the reference to the applicant in subclause (1)(b) is to the authorised person who is identified in the application as the proposed holder of the wildlife approval.</i>	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 2.	Addressed , see Project Responsibilities in Appendix 7, p. 19 and Methodology (include Vegetation management, surveys, salvage and relocation, relocations, adaptive management) on p.22 . Refer also Appendix 38 – Lizard Surveys. The site is not on public conservation land. Refer comments of DoC – Potential lizard relocation sites not identified, but information provided is relation to relocation is considered sufficient for the purpose it is required.
2(1)(c)	An assessment of the activity and its impacts against the purpose of the Wildlife Act	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 3.	Addressed , throughout Appendix 7 .
2(1)(d)	List protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 3.	Addressed , a desktop survey has been conducted to determine if any native lizards had been observed in the vicinity of the development area. Table 1 on p.2 of Appendix 7 lists 9 herpetofauna observed in proximity of the development site. The information provided has been informed by the DOC herpetofauna database and the opensource species

			<p>identification system (iNaturalist) as well as an ecologist site visit and survey.</p> <p>A further baseline survey has also occurred on the site (Appendix 38), confirming the presence of lizards.</p>
2(1)(e)	An outline of impacts on threatened, data deficient, and at- risk wildlife species (as defined in the New Zealand Threat Classification System)	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 3.	<p>Addressed, as referenced, the applicant states that impacts could include habitat removal and mortality of lizard specimens as caused by site construction works. Although the impacts are broad, the clause requires an outline of the impacts. A high-level description is suitable since site assessments have identified lizard habitats but have not confirmed the presence of lizards.</p> <p>The threat status of the lizards is listed within section 4.2 of Appendix 7 (pp.20-21).</p>
2(1)(f)	A statement of how the methods proposed to be used to conduct the actions involving protected wildlife will ensure that best practice standards are met	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 3.	<p>Addressed, As stated above and on page 3 of Appendix 7, the applicant identifies the actions (clause b) as below:</p> <ul style="list-style-type: none"> - Vegetation clearance - Building and debris clearance - Site earthworks - Other operations <p>Methods for vegetation management, trapping pre-development, salvage and relocation, and accidental discovery protocol are discussed from page 22-26 of Appendix 7.</p> <p>The applicant has assessed their actions against the purpose of the Wildlife Act, as required by cl 7 (1)(c) of Sched 7, that the site area has potentially identified lizard habitat and disturbance of the site will in turn disturb the lizards.</p> <p>The applicant has asserted that the LMP provided will ensure that best practice standards are met via adaptive management and protocols, see s6.5 of Appendix 7 p.26.</p>
2(1)(g)	A description of the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 3.	<p>Addressed, descriptions have been provided for 'pre-clearance salvage and relocation' which include methods to catch, hold, and relocate see p.23 Appendix 7. Accidental discovery procedures are discussed on p. 19.</p>

2(1)(h)	A statement of the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available)	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 3.	Addressed , description of site and surrounding environment and contextual maps are provided, pp. 13-19, paras. 28-61. See also Appendix 3 Capture Scheme Plans. Note , the applicant has included a statement of the locations at which the project will be carried out as a whole. This is deemed as sufficient in terms of the purposes of section 46, however, DOC has provided feedback that they expect to see specific relocation sites in the case that lizards are found.
2(1)(i)	A statement of whether authorisation is sought to temporarily hold or relocate wildlife	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 3.	Addressed . A statement has been provided as referenced. Refer also Appendix 38 Section 3, where it is recommended that lizard salvage and relocation is conducted.
2(1)(j)	A list of all actual and potential wildlife effects (adverse or positive) of the proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 4.	Addressed , potential impacts have been identified as referenced by the applicant and include habitat removal and mortality of lizards. The AEE outlines Ecology and Biodiversity Effects (Herpetology, Freshwater, and Avifauna) on pp. 66-68 and in more detail on Lizards within Appendix 7 , pp. 21-22. Please note feedback from DOC: <i>'DOC would anticipate that effects would be informed by surveys detailing species present on the site. As detailed surveys have not been provided as part of the application it is unlikely all effects are identified.'</i>
2(1)(k)	Where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife)	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 4.	Addressed , Methods to minimise effects on lizards are stated within Appendix 7 , pp. 21-26. See also Appendix 38 .
2(1)(l)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan),	Addressed , a statement is provided within Appendix 7, p.4

		section 3, page 4.	
2(1)(m)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has any current criminal charges under the Wildlife Act pending before a court	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 4.	Addressed , a statement is provided within Appendix 7, p.4
2(1)(n)	Provision of proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 4-5.	Addressed , - consultation summary with DOC is provided (Appendix 7, p.37) - Te Taumutu Rūnanga via Mahaanui Kurataiao Ltd includes ecological recommendations specific to impacts (Appendix 30, p.8) - Te Ngāi Tūāhuriri Rūnanga via Mahaanui Kurataiao Ltd includes ecological recommendations specific to impacts (Appendix 29, p.8).
2(1)(o)	Provision of any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal	Appendix 7 (Lizard Habitat Assessment and Lizard Management Plan), section 3, page 5.	Addressed , within Appendix 7 .

CHECKLIST J – Listed project information requirements

Section, Fast-track Approvals Act	Information required for a substantive application under section 43(2) and section 13(4)	Application Reference (Name of document, section and page)	EPA Office use only – EPA comments on completeness Note – for reference to the AEE, page numbers refer to the PDF reader rather than the documents.
13(4)(a)	a description of the project and the activities it involves	AEE, the Proposal, pages 10-19	Addressed , description of activities is provided, pp. 20-29, paras. 62-107 of the AEE.
13(4)(c)	information to demonstrate that the project does not involve any ineligible activities (other than activities that may be the subject of a determination under section 23 or 24)	AEE, introduction, page 1; see also Covering letter to the Application, Attachment 2, paragraph 2.2	Addressed , as referenced on p. 11, para. 26, of the AEE and within the Covering letter.
13(4)(d)	a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application	AEE, Site and Surrounding Environment, pages 3-9.	Addressed , description of site and surrounding environment and contextual maps are provided, pp. 13-19, paras. 28-61 of the AEE. See also Appendix 3 Capture Scheme Plans.
13(4)(e)	the anticipated commencement and completion dates for construction activities (where relevant)	Appendix (Application/ Authorised Persons' Statement), pg 2, para [13]	Addressed , para. 13 of Appendix 1 states that Carter Group is prepared to commence development as soon as possible after obtaining relevant approvals.
13(4)(f)(i)	a statement of whether the project is planned to proceed in stages and, if so an outline of the nature and timing of the stages	AEE, Subdivision (Allotments and Staging) pages 11-12; see also Appendix 1	Addressed , paras. 13-16 of Appendix 1 states that it is proposed to develop the project in two stages within 12 months of each other, however the stages may occur concurrently.

		(Applicants/ Authorised Persons' Statement)	
13(4)(h)	a description of the anticipated and known adverse effects of the project on the environment	AEE, Assessment of Actual and Potential Effects on the Environment, pages 29-68	Addressed , a description has been provided.
13(4)(i)	a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991	Covering letter to the Application, Attachment 2, paragraph [2.7].	Addressed , statement included.
13(4)(j)	a list of the persons and groups the applicant considers are likely to be affected by the project, including— <ul style="list-style-type: none"> (i) relevant local authorities: (ii) iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements: (iii) other relevant iwi authorities: (iv) relevant Treaty settlement entities: (v) relevant protected customary rights groups and customary marine title groups: (vi) ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou: (vii) relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011: (viii) persons with a registered interest in land that may need to be acquired under the Public Works Act 1981: 	AEE, Consultation, pages 75-77.	Addressed , pp. 85-87 of the AEE.

13(4)(k)	a summary of— (i) the consultation undertaken for the purposes of section 29 and any other consultation undertaken on the project with the persons and groups referred to in paragraph (j); and (ii) how the consultation has informed the project:	AEE, Consultation, pages 75-77.	Addressed , pp. 85-87 of the AEE.
13(4)(l)	a list of any Treaty settlements that apply to the project area, and a summary of the relevant principles and provisions in those settlements	No treaty settlements apply to the project area.	Addressed , the application has stated that no treaty settlements apply. See Covering letter attachment (p.9, para. 2.10).
13(4)(m)	a description of any processes already undertaken under the Public Works Act 1981 in relation to the project	No processes have been undertaken under the Public Works Act 1981.	Addressed , the application has stated that no processes have been undertaken under the Public Works Act 1981 in relation to the Project. See Covering letter attachment (p.10, para 2.11).
13(4)(n)	a statement of any relevant principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019	The Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 is not relevant to the application.	Not applicable to this application. See Covering letter attachment.
13(4)(o)	information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area	There are no parcels of Māori land, marae, and identified wāhi tapu within the project area.	Not applicable to this application
13(4)(p)	a statement of whether the applicant is seeking a determination under section 23 and, if so, an assessment of the effects of the activity on the relevant land and on the rights and interests of Māori in that land	The applicant is not seeking a determination under s 23; see covering letter to the Application, Attachment 2, paragraph [2.14].	Not applicable to this application

13(4)(q)	<p>a statement of whether the applicant is seeking a determination under section 24(2) and, if so, a description of—</p> <ul style="list-style-type: none"> (i) the scale and adverse effects of the existing electricity infrastructure; and (ii) how, if at all, that scale or those adverse effects are anticipated or known to change as a result of the maintenance, upgrading, or continued operation of the infrastructure 	<p>The applicant is not seeking a determination under s24(2); Covering letter to the Application, Attachment 2, paragraph [2.15].</p>	<p>Not applicable to this application</p>
13(4)(r)	<p>a statement of whether the applicant is seeking a determination under section 24(4) and, if so,—</p> <ul style="list-style-type: none"> (i) a description of every alternative site considered by the applicant (or, if the referral application is lodged by more than 1 person, any of those persons) for the construction and operation of the new electricity lines (the activity); and (ii) for each alternative site considered,— <ul style="list-style-type: none"> (A) a statement of the anticipated and known financial cost of undertaking the activity; and (B) a description of the anticipated and known adverse effects of undertaking the activity; and (C) a description of the anticipated and known financial cost and practicality of available measures to avoid, remedy, mitigate, offset, or compensate for the anticipated and known adverse effects of the activity; and (D) a description of any issues (including financial cost) that would make it impractical to undertake the activity on the 	<p>The applicant is not seeking a determination under s 24(4) Covering letter to the Application, Attachment 2, paragraph [2.16].</p>	<p>Not applicable to this application</p>

	<p>site; and</p> <p>(E) an assessment of whether it would be reasonable and practical to undertake the activity on the site, taking into account the matters referred to in subparagraphs (A) to (D) and any other relevant matters</p>		
13(4)(s)	a description of the applicant's legal interest (if any), or if the application is lodged by more than 1 person, the legal interest of any of those persons) (if any), in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work	Appendix 1(Applicant/Authorised Persons' Statement), page 1, paragraphs [6]-[7].	Addressed , in Appendix 1, p.1, paras. 6-7. The applicant group have signed a contract to purchase the land with the current registered landowner's conditional of obtaining the necessary approvals. Records of Titles are provided in Appendix 2 .
13(4)(t)	an outline of the types of consents, certificates, designations, concessions, and other legal authorisations (other than contractual authorisations or the proposed approvals) that the applicant considers are needed to authorise the project, including any that the applicant considers may be needed by someone other than the applicant	Covering letter to the Application, Attachment 2, paragraph [2.18].	Addressed , see Covering Letter to the Application dated 16 April 2025, p.10, para. 2.18
13(4)(u)	whether any activities that are involved in the project, or are substantially the same as those involved in the project, have been the subject of an application or a decision under a specified Act and,— <p>(i) if an application has been made, details of the application:</p> <p>(ii) if a decision has been made, the outcome of the decision and the reasons for it:</p>	Covering letter to the Application, Attachment 2, paragraph [2.19].	Addressed , see Covering Letter to the Application, p.10, para. 2.19
13(4)(v)	a description of whether and how the project would be affected by climate change and natural hazards	AEE, Actual or Potential Effects, pages 50-51; see also Appendix 25 (Green House Gas Emissions	Addressed , as referenced (noting the page numbers of the AEE are pp. 60-61, paras. 236-239.

		Assessment), page 14, paragraph 57; Appendix 5 (Geotechnical Assessment), section 5, page 9; Appendix 30 (Flood Hazard Assessment), section 4, pages 6-7.	
13(4)(w)	if the application is lodged by more than 1 person, a statement of the proposed approval to be held by each of those persons	N/A	Addressed, the application is not lodged by more than one authorised person as stated within the Covering Letter (p.10, para. 2.21).
13(4)(x)	a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant (or if the application is lodged by more than 1 person, any of those persons) under a specified Act	Covering letter to the Application, Attachment 2, paragraph [2.22]. There have been no compliance or enforcement actions taken against the applicant.	Addressed, as referenced.
13(4)(y)	Please provide the information specified below for the relevant approval(s) sought. This is the information specified in the relevant schedule.		
13(4)(y)(i), clause 2 of Schedule 5	Resource consent or designation (a) an assessment of the project against— (i) any relevant national policy statement; and (ii) any relevant national environmental standards; and (iii) if relevant, the New Zealand Coastal Policy	AEE, Relevant Provisions of Planning Instruments, pages 69-72.	Addressed , as referenced (noting pdf reader pages are: pp.79-82)

	Statement; and		
	<p>(iv) in relation to any proposed approval that is a resource consent, whether, to the best of the applicant's knowledge, there are any existing resource consents of the kind referred to in section 30(3)(a).</p> <p><i>Guidance note: If the application is to be lodged by more than 1 person, the reference to the applicant in subclause (1)(b) is to the person who will be identified in the application as the proposed holder of the resource consent.</i></p>	Christchurch City Council and Canterbury Regional Council have both confirmed that there are no existing consents of the kind referred to in s 30(3); see Appendix 33 and Appendix 34.	Addressed,
13(4)(y)(ii), clause 3 of Schedule 5	<p>Change or cancellation of resource consent condition</p> <p>The information to be provided under section 13(4)(y)(ii) is information about whether and how the change or cancellation of the condition is material to the implementation or delivery of the project.</p>		Not applicable – the application has no relevance to this clause.
13(4)(y)(iii), clause 4 of Schedule 5	<p>Certificate of compliance</p> <p>The information required to be provided under section 13(4)(y)(iii) is information that shows the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent. Include information that shows that the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent.</p>		Not applicable – the application has no relevance to this clause.
13(4)(y)(iv), clause 2 of Schedule 6	<p>Concession</p> <p>(1) The information in subclause (2) is required to be provided under section 13(4)(y)(iv) if a proposed concession includes a lease and—</p>		Not applicable – the application has no relevance to this clause.

	<p>(a) the lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and</p> <p>(b) the granting of the lease would trigger a right of first refusal or a right of offer or return.</p> <p>(i) Confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return to waive that right for the purposes of the proposed lease.</p> <p><i>Guidance note: If the application is to be lodged by more than 1 person, the reference to the applicant in subclause (2) is to the person who is to be identified in the application as the proposed holder of the concession (clause 2(3) of Schedule 6).</i></p>		
13(4)(y)(v), clause 23 of Schedule 6	<p>Land exchange</p> <p>(ii) The information required to be provided under section 13(4)(y)(b) is (a) - (e) below:</p> <p><i>Guidance note: If the substantive application is to be lodged by more than 1 person, the reference to the applicant in subclause (2)(d) is to the person who is to be identified in the application as the person proposed to exchange land (clause 23(2) of Schedule 6).</i></p> <p>a) a description of both land areas proposed for exchange (for example, maps showing areas and location, addresses, and legal descriptions where possible:</p>		Not applicable - the application has no relevance to this clause.
	b) the financial value of the land proposed to be acquired by the Crown:		Not applicable - the application has no relevance to this clause.
	c) a brief description of the conservation values of both pieces of land, including an explanation of why the exchange would benefit the conservation estate:		Not applicable - the application has no relevance to this clause.

	d) if the land exchange would trigger a right of first refusal or a right of offer or return, confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return that the holder has agreed to waive that right for the purpose of the land exchange:		Not applicable – the application has no relevance to this clause.
	e) confirmation by the applicant that no part of any land to be exchanged by the Crown is – (iii) land listed in Schedule 4; or (iv) a reserve declared to be a national reserve under section 13 of the Reserves Act 1977		Not applicable – the application has no relevance to this clause.
13(4)(y)(vi), clause 2 of Schedule 9	Standard or complex freshwater fisheries activity approval (1) The information required to be provided under section 13(4)(y)(vi) is the following: (a) whether an in-stream structure is proposed (including formal notification of any dam or diversion structure) and the extent to which this may impede fish passage; and (b) whether any fish salvage activities or other complex freshwater fisheries activities are proposed.		Not applicable – the application has no relevance to this clause.
13(4)(y)(vii), clause 2 of Schedule 10	Marine consent The information required to be provided under section 13(4)(y)(vii) is– (a) information about whether the Minister of Conservation is an affected person:		Not applicable – the application has no relevance to this clause.
	(b) additional information about whether the applicant has already made an application for a consent under the EEZ Act in relation to the project, and, if so, – I. details of any application made; and II. the decisions made on that application; and III. information about the matters that the Minister may consider under section 22(6):		Not applicable – the application has no relevance to this clause.

	<p>(c) additional information (in a summary form) about compliance or enforcement action taken against the applicant by the EPA under the EEZ Act.</p> <p>Guidance note: If the application is to be lodged by more than 1 person, the reference to the applicant in subclause (1)(b) is to the person who is to be identified in the application as the proposed holder of the marine consent (clause 2(2) of Schedule 10).</p>		<p>Not applicable – the application has no relevance to this clause.</p>
<p>13(4)(y)(viii), clause 2 of Schedule 11</p>	<p>Access arrangement</p> <p>(i) Confirmation that the applicant has complied with section 12(2) (for the purposes of section 13(4)(y)(viii)).</p> <p><i>Guidance note: If the referral application is to be lodged by more than 1 person, the reference to the applicant in subclause (1) is to the person who is to be identified in the application as the proposed holder of the access arrangement (clause 2(2) of Schedule 11).</i></p>		<p>Not applicable – the application has no relevance to this clause.</p>
<p>13(4)(y)(ix), clause 15 of Schedule 11</p>	<p>Mining permit</p> <p>(1) For the purposes of section 13(4)(y)(ix), the information is—</p> <p>(a) a copy of the relevant exploration permit or existing privilege to be exchanged for a mining permit that entitles the holder to mine a Crown owned mineral:</p> <p>(b) the name and contact details of the proposed permit participants and the proposed permit operator:</p> <p>(c) a proposed work programme for the proposed permit, which may comprise committed work, committed or contingent work, or both:</p> <p>(d) evidence of the technical or financial capability of the proposed permit holder to comply with and give proper effect to the work programme:</p> <p>(e) information about the proposed permit holder’s history of compliance with mining or similar permits</p>		<p>Not applicable – the application has no relevance to this clause.</p>

<p>and their conditions:</p> <p>(f) the proposed date on which the substantive application is intended to be lodged:</p> <p>(g) if the authorised person proposes to provide information under section 37, the date on which the person intends to provide that information:</p> <p>(h) The proposed duration of the permit:</p> <p>(i) if the proposed approvals include a mining permit for petroleum,—</p> <p>(i) a map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be same area as the area over which the mining permit application is intended to be made), and the extent of the resource to which the development plan relates:</p> <p>(ii) the resources and reserves relating to the project, estimated in accordance with the Petroleum Resources Management System:</p> <p>(iii) a high-level overview of the following:</p> <p>(A) the proposed field development plan:</p> <p>(B) the proposed date for the commencement of petroleum production:</p> <p>(C) the economic model for the project:</p> <p>(D) the proposed duration of the proposed mining permit:</p> <p>(E) decommissioning plans:</p> <p>(j) if the proposed approvals include a mining permit for minerals other than petroleum,—</p> <p>(i) a map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or</p>		
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	<p>existing privileges is proposed (which must be same area as the area over which the mining permit application is intended to be made), and the extent of the resource and reserves to which the development plan relates:</p> <ul style="list-style-type: none"> (ii) for minerals other than gold or silver, a report or statement confirming the ownership of the minerals targeted: (iii) whether the application will be for a Tier 1 or Tier 2 permit: (iv) an estimate of the mineral resources and reserves relating to the project, including a summary on acquisition of the data and the data underpinning the estimate (such as information on sample locations, grade, and geology): (v) an indicative mine plan: (vi) a high-level overview of the following: <ul style="list-style-type: none"> (A) the proposed mining method: (B) the proposed date for the commencement of mining and estimated annual production: (C) the economic model for the project: (D) the status of or anticipated timing for completing any prefeasibility or feasibility studies: (E) the proposed methods for processing mined material and handling and treating waste: (F) anticipated plans for mine closure and rehabilitation. <p>(2) For the purpose of subclause (1)(j)(iv), for a Tier 1 permit application the resources and reserves relating to the project are to be estimated in accordance with a recognised reporting code such as JORC or NI 43-101</p>		
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